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FINAL

HOLLISTER planning AREA

RESOURCE MANAGEMENT PLAN & ENVIRONMENTAL IMPACT STATEMENT

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
BAKERSFIELD DISTRICT

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IN REPLY REFER TO

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
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Dear Reviewer:

Enclosed for your review is the Final Environmental Impact Statement (FEIS) on the Hollister Resource Management Plan for public lands located in Fresno, San Benito, Monterey, Madera, Merced, Stanislaus, Santa Clara, San Joaquin, Alameda, Contra Costa, San Mateo and Santa Cruz counties, California, within the Bakersfield BLM District. The EIS also fulfills the environmental assessment requirements for livestock grazing management within the Planning Area.

The statement was prepared pursuant to Section 102(2)(C) of the National Environmental Policy Act of 1969. It is based on information from the Bureau of Land Management and other sources, including Federal, State and local agencies, and interested private organizations and citizens. As no concerns raised during the public review of the Draft EIS required major revisions of the document, the Final EIS has been prepared in an abbreviated format consistent with provisions of Section 1500 of 40 CFR, the Council on Environmental Quality's regulations for the implementation of NEPA. The Final EIS includes all comments received during the public review, responses to each comment, and required modifications of the text. This document should therefore be used in conjunction with the previously published Draft EIS.

This FEIS contains BLM's Resource Management Plan. This plan is a refinement of the Balanced Use Alternative presented in the Draft Environmental Impact Statement (DEIS) published July, 1983. The major change from the DEIS is a modification of recreation-related proposals in the Hernandez Valley and Pinnacles areas.

All parts of this plan may be protested. Protests should be sent to the Director, Department of the Interior, Bureau of Land Management, 18th and C Streets, N.W., Washington, D.C. 20240, prior to MAY 15 *, 1984 (the end of the 30-day protest period) and should include the following information:*

- *The name, mailing address, telephone number, and interest of the person filing the protest.*

- *A statement of the issue or issues being protested.*

- *A statement of the part or parts being protested.*

- *A copy of all documents addressing the issue or issues that were submitted during the planning process by the protesting party or an indication of the date the issue or issues were discussed for the records.*

- *A short concise statement explaining why the BLM State Director's proposed decision (Preferred Alternative) is wrong.*

At the end of the 30-day protest period, the Resource Management Plan, excluding any portions under protest, shall become final. Approval shall be withheld on any portion of the plan under protest until final action has been completed on such protest. The approval process and the final resource management plan will be published with the Record of Decision in May, 1984.

Sincerely yours,

Roy E. Raschen, Assoc. D.M.

for Robert D. Rheiner, Jr.
District Manager

Enclosure

BLM CA ES 84 003 1792

Final Environmental Impact Statement

PROPOSED RESOURCE MANAGEMENT PLAN FOR THE HOLLISTER PLANNING AREA FRESNO, SAN BENITO, MONTEREY, MADERA, MERCED, STANISLAUS, SAN JOAQUIN, ALAMEDA, CONTRA COSTA, SAN MATEO, SANTA CLARA, AND SANTA CRUZ COUNTIES, CALIFORNIA

Prepared by
Department of the Interior
Bureau of Land Management
Bakersfield District

The Bureau of Land Management proposes to implement a multiple-use Resource Management Plan on 328,378 acres of public land in the Hollister Planning Area of California.

The four alternative plans represent a spread between development oriented and protection oriented resource allocations. Environmental consequences of the proposed plan and each of the alternatives are described in the Summary Introduction and in Chapter 4 of the EIS.

Ed Hastey
State Director, California

For further information contact:

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P.O. Box 365
Hollister, California 95024-0365
Phone: (408) 637-8183

Date by which comments are due: MAY 15 1984

SUMMARY

This EIS examines 4 alternatives:

1. Maximize Protection (Includes No Grazing)
2. Balanced Use (Proposed Action)
3. Maximize Protection
4. No Action (Present Management)

For 16 Management Areas:

1. Monterey Bay
2. Gabilans/Diablo
3. Sierra de Salinas
4. Pinnacles
5. Call Mountain/Hernandez Valley
6. Panoche Hills
7. Griswold/Tumey Hills
8. Clear Creek/Condon Peak
9. Ciervo Hills/Joaquin Rocks
10. Coalinga Mineral Springs
11. Coalinga
12. Parkfield
13. Williams Hill
14. Central San Joaquin
15. Squaw Leap
16. South Bay

Dealing with 10 Issues/Resources:

A. Livestock Grazing
B. Oil, Gas and Minerals
C. Fire Management
D. Recreation
E. Land Tenure
F. Sensitive, Rare, Threatened or Endangered Species
G. Soil, Air and Water (Watershed)
H. Wildlife Habitat
I. Cultural Resources
J. Visual Resources

Concerning Multiple-Use Resource Management on 328,378 acres of public land within the Hollister Planning Area.

Cumulative Alternative Summary

Issue/Resource	Alternative 1 Maximize Protection	Alternative 2 Balanced Use	Alternative 3 Maximize Production	Alternative 4 Present Management
LIVESTOCK GRAZING				
Forage Allocation (AUMs)				
Livestock	23,337	30,683	39,112	31,615
Wildlife	14,475	8,703	1,733	6,507
Number Allotment Management Plans	8	15	15	8
Number Acres Leased	243,782	211,726	202,225	243,782
OIL, GAS AND MINERALS				
Acres Open to Mineral Entry	312,920	320,629	328,378	312,920
Mineral Segregation (Acres)	15,458	7,749	0	15,458
ACEC for Paleontological Resources (Acres)	18,000	18,000	0	0
FIRE MANAGEMENT				
Prescribed Burns (Acres)	94,000	125,400	152,200	110,500
RECREATION				
Accessible Acres	143,000	175,000	227,000	150,000
Number Special Recreation Management Areas	4	4	8	4
LAND TENURE				
Retention (Acres)	328,378	313,270	302,639	328,378
Disposal (Acres)	0	15,108	25,739	(Unknown)
RARE, THREATENED OR ENDANGERED SPECIES (RTE)				
ACEC for Endangered Animals (Acres)	12,500	12,500	0	0
ACEC for Rare Plants (Acres)	30,000	30,000	0	0

Cumulative Alternative Summary

Issue/Resource	Alternative 1 Maximize Protection	Alternative 2 Balanced Use	Alternative 3 Maximize Production	Alternative 4 Present Management
SOIL, AIR AND WATER				
ACEC for Asbestos Hazard and Critical Watershed (Acres)	30,000	30,000	0	0
WILDLIFE HABITAT				
Number Habitat Management Plans	4	6	5	4
VISUAL RESOURCES				
Acres Class 1 and 2	12,183	12,183	12,183	12,183
Acres Class 3	144,866	144,866	123,355	123,355
Acres Class 4	174,593	174,593	196,104	196,104
CULTURAL (ARCHAEOLOGICAL) RESOURCES				
Number Cultural Resource Management Plans	5	5	1	2

NOTE: Alternatives include No Grazing (Alternative 1A).
ACEC for rare plants, asbestos hazard and critical watershed area is geographically the same location (Clear Creek serpentine area).

CUMULATIVE IMPACT SUMMARY

ISSUE/RESOURCE	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4
LIVESTOCK GRAZING	- Significant decrease in deer/livestock competition. - Possible increased oak regeneration. - Increased fire hazard in grassland areas. - Range condition static to slight improvement on chaparral sites. - Deer numbers would increase slightly to moderately. - Upland game and RTE habitat would be improved. - Decrease of 8,367 livestock AUMs. - Moderate to high economic impact to livestock operators. <u>Alt. 1A - No Grazing</u> - No change in range condition from Alt. 1.	- Decrease in deer/livestock competition. - Improvement of livestock distribution. - Slight to moderate improvement in range condition on chaparral sites. - Deer numbers would increase slightly. - Upland game and RTE habitat would be improved. - 11 leases cancelled, 24 leases reduced (from suitability adjustments). - Decrease of 752 livestock AUMs.* - Increase of 2,156 wildlife AUMs. - Slight economic impact to livestock operators from reduction or cancellation.	- Significant increase in deer/livestock competition. - Improvement of livestock distribution. - Moderate to significant improvement in range condition on chaparral sites. - Deer numbers would decrease slightly to moderately. - Upland game and RTE habitat would decline significantly. - 9 leases cancelled, 11 leases reduced. - Increase of 7,497 livestock AUMs. - Decrease of 4,774 wildlife AUMs. - Slight economic impact to livestock operators from reduction or cancellation.	- Slight improvement in range condition on chaparral sites. - Deer numbers would increase slightly. - Upland game and RTE habitat would be improved. - No leases cancelled or reduced.

* NOTE: Some leases and some MAs would show fairly significant increases.

CUMULATIVE IMPACT SUMMARY

ISSUE/RESOURCE	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4
LIVESTOCK GRAZING (continued)	- Significant increase in fire hazard in grassland areas. - Moderate to large increase in deer numbers. - Significant improvement in upland game and RTE habitat. - Significant economic impact to livestock operators.			
OIL, GAS AND MINERALS	- Mineral exploration and development precluded on approximately 5% of the Planning Area. - Significant resource values protected. - Significant paleontological values protected.	- Mineral exploration and development precluded on approximately 2% of the Planning Area. - Critical resource values protected. - Significant paleontological values protected.	- No constraints on mineral development. - Significant resource values may be impacted by mining activities.	- Mineral exploration and development precluded on approximately 5% of the Planning Area. - Significant resource values protected.
FIRE MANAGEMENT	- Reduced hazard of wildfire and suppression costs on 78,000 acres of chaparral. - Minimized erosion and soil disturbance. - Average 10-30% burn of treatment area.	- Reduced hazard of wildfire and suppression costs on 78,000 acres of chaparral. - Average 40-80% burn of treatment area.	- Reduced hazard of wildfire and suppression costs on 78,000 acres of chaparral. - Maximum erosion and soil disturbance. - Average 80-90% burn of treatment area.	- Reduced hazard of wildfire and suppression costs on 78,000 acres of chaparral. - Average 40-80% burn of treatment area.

CUMULATIVE IMPACT SUMMARY

ISSUE/RESOURCE	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4
RECREATION	- Total visitor use 381,000 visitor hours per year. - Small decline in hunting, hiking and camping opportunities. - Reduced recreation related impacts and conflicts.	- Total visitor use 518,000 visitor hours per year. - Increase in hunting, hiking, camping and ORV opportunities. - Some increase in recreation related impacts and conflicts.	- Total visitor use 731,000 visitor hours per year. - Significant increase in recreation related impacts (ORVs) and conflicts. - Increased fire hazard.	- Total visitor use 400,000 visitor hours per year. - Some recreation related impacts and conflicts continue.
LAND TENURE	- Same as Alt. 4 except for consolidation.	- Approximate fair market value of $2.4 million from sale of public lands. - Insignificant loss of grazing from public lands. - Increased manageability and public access from consolidation. - Increased revenue for local governments. - 10 leases cancelled, 8 leases reduced (from land tenure adjustments.	- Approximate fair market value of $4.4 million from sale of public lands. - Slight loss of grazing from public lands. - Increased manageability and public access from consolidation. - Increased revenue for local governments. - 21 leases cancelled, 8 leases reduced.	- Some increase in manageability and public access from consolidation. - Continued management costs associated with small, scattered parcels. - Otherwise no significant impacts.

Visitor Hour - One hour spent on public land by one recreationist.

CUMULATIVE IMPACT SUMMARY

ISSUE/RESOURCE	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4
SENSITIVE, RARE, THREATENED OR ENDANGERED SPECIES (RTE)	- Significant habitat for RTE plants and animals protected and enhanced.	- Significant habitat for RTE plants and animals protected and enhanced.	- RTE plants and animals minimally protected. - Impacts to significant plant habitat in Clear Creek likely from mining activity. - RTE animal habitat in the Panoche Hills Area would deteriorate from heavy grazing.	- RTE plants and animals continue to be protected.
SOIL, AIR AND WATER (WATERSHED)	- Minimized erosion and sedimentation. - Significant restrictions on other uses. - Increased public awareness and possible reduction of asbestos related health hazards. - Increased water yield from prescribed burning.	- Reduced erosion and sedimentation. - Increased public awareness and possible reduction of asbestos related health hazards. - Increased water yield from prescribed burning.	- Increased sedimentation, stream channel erosion and decreased water quality from increased grazing. - Increased public exposure to asbestos related health hazards. - Increased water yield from prescribed burning.	- Some continued asbestos related health hazards. - Accelerated erosion and sedimentation of Clear Creek may continue. - Increased water yield from prescribed burning.

CUMULATIVE IMPACT SUMMARY

ISSUE/RESOURCE	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4
WILDLIFE HABITAT	- Same as Alt. 4	- Habitat improvement on 25,000 acres (prescribed burning). - 76,000 acres of upland game habitat improved. - Deer and other populations increase in long term in habitat management areas.	- Habitat improvement on 19,000 acres (prescribed burning). - Significant negative impacts to upland game habitat on 76,000 acres. - Deer and other populations decrease in the Panoche Hills and Coalinga Mineral Springs areas from competitition with livestock grazing.	- Habitat improvement on 16,000 acres (prescribed burning). - 76,000 acres of upland game habitat improved. - Deer and other populations increase in long term habitat management areas.
VISUAL RESOURCES	- Significant visual resources protected.	- Significant visual resources protected.	- Slight degradation to visual resources could occur.	- Slight degradation to visual resources could occur.
CULTURAL RESOURCES	- Most significant sites would be protected. - May constrain mining and/or fire management activities.	- Additional protection provided for significant sites in the Ciervo Hills, Joaquin Rocks, Fresno River and Mine Mountain areas.	- Significant sites (both known and unknown) may be impacted.	- Some sites continue to be impacted by grazing, ORVs, mining and casual collection. - Significant sites in Squaw Leap and Clear Creek protected.

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CHANGES TO THE DEIS

CHAPTER 1 - ERRATA

Page 1-3, Recreation Goal, substitute the following:

- Provide recreational opportunities in response to public demands.
- Protect other resource values such as cultural resources and habitat for sensitive, rare, threatened or endangered species.
- Minimize conflicts with adjacent property owners and among user groups.

Page 1-4, Rare, Threatened or Endangered Species, under Goal, substitute "recover" for the word "sustain."

CHAPTER 2 - ERRATA

Page 2-2, Moreno Paleontological Area ACEC, first sentence at top of page, after the word "disturbance," insert" (oil, gas and mining activities, etc.)."

Page 2-2, Clear Creek Serpentine Area ACEC, substitute the following:

- Designate 30,000 acres encompassing the area of serpentine soils high in asbestos fibers, including the Clear Creek watershed.
- The ACEC will not alter existing ORV designations or preclude other uses.
- Develop a Habitat Management Plan to protect and/or enhance sensitive plant habitat in the area.
- Implement watershed "Best Management Practices" as identified in the ORV designation/implementation plan and watershed amendment.
- Continue monitoring programs assessing sedimentation in the Clear Creek drainage and impacts on sensitive or RTE plant habitat and important riparian zones.
- Identify and prioritize areas requiring further protection and/or stabilization along with recommendations for appropriate action.
- Intensify the current asbestos hazard awareness program by signing, pamphlets and increased individual user contact.

- Designate and protect representative serpentine soil research areas for their scientific and educational values.

- Designate and protect areas of significant concern for hobby gem and mineral collecting, in consultation with interested parties.

Page 2-3, Policy No. 6, substitute the following:

- Before implementation of surface disturbing projects, including range developments and vegetation manipulations, cultural resources will be inventoried and evaluated, and attempts will be made to avoid adverse impacts to National Register eligible sites, when feasible. Consultation will be made with the State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (ACHP), as necessary, to develop acceptable mitigation strategies in accordance with the Rangeland Programmatic Memorandum of Agreement (PMOA) of January 14, 1980, between the BLM, the ACHP, and the National Conference of SHPOs. Conflicts will be resolved in accordance with 36 CFR 800 and as outlined in the Memorandum of Understanding (MOU) between the California Native American Heritage Commission, the SHPO, and the BLM.

Page 2-4, Policy No. 11, add as last sentence, "The withdrawal would become effective concurrently upon termination of the existing C&MU mineral segregation."

Page 2-4, Policy No. 12, begin sentence with "Requests for rights-of-way or..."

Page 2-5, Policy No. 22, the word "with" should be "within."

Page 2-5, add the following policy statements:

No. 23, "Camping will be limited to 14 consecutive days maximum in any location area-wide."

No. 24, "Adjustments to grazing use levels will not be made unless monitoring indicates a need for change or a mutual agreement with the grazing lessee can be reached."

No. 25, "Restrict travel on unsurfaced roads in wet weather to the extent possible."

No. 26, "All roads not required for administrative purposes or public use should be closed and rehabilitated."

No. 27, "The Bureau will file for State appropriative water rights for all existing and any new surface water facilities on which any federal funding has been expended, in the development, construction or maintenance of the water facility. Filing will be either solely in the name of the BLM or as a co-holder with the permittee or lessee making beneficial use of the water. In addition, the Bureau will assert Federal reserved water rights for the amounts and uses necessary to accomplish the purposes for which the lands have been withdrawn."

No. 28, "Private individuals may appropriate unappropriated water on unreserved lands for use on or off the public lands. The appropriation must be in accordance with state laws and consistent with multiple-use management of the public lands. Private individuals may also use reserved water when water is available and the proposed use is compatible with the purposes of the reservation and other multiple-use management guidelines. Rights-of-way are necessary when water from any source is conveyed across public land."

No. 29, "Protection or enhancement of riparian areas will be given consideration in all activity plan development."

Page 2-14, Table 2-4, Livestock Grazing, Alternative 2, after the third sentence, insert "Manage for 700 lbs/acre residual forage on the larger "M" category allotments."

Page 2-16, Table 2-4, Recreation, Alternative 2, for first sentence substitute "Hunting access will be considered for possible future implementation in cooperation with the NPS, private landowners, the Department of Fish and Game and the Department of Forestry. In the interim, develop a cooperative agreement with the NPS to enhance hiking opportunities on adjacent parcels of public lands, consistent with the Pinnacles Master Plan."

Page 2-17, Table 2-5, Livestock Grazing, Alternative 2, end of last sentence in second paragraph, add "on all "I" and larger "M" category allotments."

Page 2-19, Table 2-5, Recreation, Alternative 2, first sentence, after "Same as Alt. 4," delete rest of sentence. Second sentence, "Tucker Gulch" should be "Tucker Mountain." After second sentence, add "Also consolidate lands in the Laguna Mountain Area." Under SUPPORT delete "trail construction from Clear Creek to Hernandez Reservoir."

Page 2-20, Table 2-5, Land Tenure, Alternative 2, first sentence, delete "near Hernandez Reservoir" and substitute "in the Laguna Mountain Area."

Map 4a (Alternative 2), will be revised to reflect ORV opportunities (2b) in the area north of the Clear Creek Management Area and consolidation of public lands (7) in the Laguna Mountain Area.

Page 2-27, Table 2-7, Recreation, Alternative 2, after last sentence (before SUPPORT), add "Vehicle use limited to four-wheeled vehicles on designated routes."

Page 2-28, Table 2-7, Visual Resources, Alternative 4, should be "VRM Class 3."

Page 2-33, Table 2-8, Vegetation, Alternative 1, second sentence after the word "protection," insert "and/or enhancement."

Page 2-33, Table 2-8, Vegetation, Alternative 2, after first sentence, add "No commercial harvest in the San Benito Mountain Natural Area." End of last sentence, add "as in Alt. 1."

Page 2-34, Table 2-8,, Soil, Air and Water, Alternative 2, first sentence, after the word "watershed" substitute "amendment to the ORV designation and implementation plan to establish Best Management Practices for additional watershed enhancement/stabilization measures." Under SUPPORT add "and/or other control measures as appropriate."

Page, 2-35, Table 2-8, Wildlife Habitat and RTEs, Alternative 2, substitute after "Same as Alt. 4," "Develop an HMP with emphasis on deer and wildlife habitat improvement. Prescribe burn to maintain uneven-aged brushfields as outlined in Alt. 4. Combine development with HMP to be prepared for the area north of Clear Creek (MA #5). The major emphasis for habitat improvement will be in non-serpentine areas. In serpentine areas, protection and/or enhancement of riparian zones, and sensitive plant habitat will be emphasized in accordance with the Clear Creek ORV designation and implementation plan and ACEC designation." Under SUPPORT, insert "Approximately" as the first word.

Page 2-36, Table 2-9, Livestock Grazing, Alternative 4, second paragraph at end of last sentence, add "(Ciervo Hills AMP and larger "M" category allotments)."

Page 2-38, Table 2-9, Recreation, Alternative 2, after last sentence (before SUPPORT), add "Vehicle use in the Ciervo Hills portion of the MA outside the OHV area would be limited to four-wheeled vehicles on designated routes."

Page 2-41, Table 2-10, Livestock Grazing, Alternative 2, second to last sentence, add "on all "I" category allotments."

Page 2-53, Table 2-13, Oil, Gas and Minerals, Alternative 4, add "No surface occupancy leases within one-mile of the base perimeters of Fort Hunter-Liggett Military Reservation."

Page 2-62, Table 2-16, Land Tenure, Alternative 2, change to "Same as Alt. 3, except no consolidation in the Red Mountain Area."

Page 2-66, Table 2-17, Recreation, Alternative 2, item one, delete "Hernandez Reservoir" and substitute "Byles Canyon/Tucker Mountain."

Page 2-72, Table 2-18, footnote, add "All costs shown are in addition to present funding level."

Map 2 (All Alternatives), San Benito Mountain Natural Area, delete T.18S., R.12E., lots 7 and 9 in Section 8 and lots 14, 15, 16 and 17 in Section 9. This was a cartographic error.

Map 2 (All Alternatives), Utility corridors, will be revised to show corridors involving public lands as designated on the WUG Western Regional Corridor Study maps.

CHAPTER 3 - ERRATA

Page 3-17, Sensitive, Rare, Threatened or Endangered (RTE) Species, second paragraph, last sentence between "As such" and "they are" insert "(under Bureau policy)."

Pages 3-22 through 3-25, Table 3-12, corrections:

Species	Potential on BLM	Habitat	Flowering Season
Chloragalum purpureum purpureum	--	--	May
Clarkia rostrata	--	--	April/May
Euphorbia hooveri	low	valley grassland (mudflats)	--
Frittillaria agrestis	low	valley grassland	--
Gratiola heterosepala	low	vernal pools, bogs, lake margins	April-June
Lewisia congdonii	low	conifer forest (all known sites on USFS)	--
Lupinus spectabilis	--	oak/foothill woodland (rocky slopes on serpentine)	--
Malacothrix saxatilis arachnoidea	--	"	June-Dec.
Monardella leucocephala	low	valley grassland	--
Orcuttia greenei	low	valley grassland (vernal pools)	--
Orcuttia pilosa	low		--
Plagiobothrys scriptus	low	valley grassland	--

Page 3-22, Table 3-12, delete "Benitoa occidentalis."

Page 3-24, Table 3-12, add "Orthocarpus campestris succulentus, MA-15, on or near BLM - yes, potential on BLM - high, habitat - shallow, clay soils on volcanic tableland, flowering season - April to July."

Page 3-25, Table 3-12, delete "Raillardella muirii" and add "Pseudobahia bahiaefolia, MA-15, on or near BLM - yes, potential on BLM - high, habitat - shallow, clay soils in volcanic tableland, flowering season - March/April."

Page 3-48, Oil, Gas and Minerals, last sentence add ", in the past. These conflicts have been largely resolved through working with the mining claimant."

Page 3-49, Page 3-51, Page 3-59, Page 3-62, Sensitive, Rare, Threatened or Endangered Species, add "Malathion spraying to control the beet leafhopper (the only known vector of the Curly Top Virus which affects a variety of agricultural crops) may be impacting the blunt-nosed leopard lizard and other species. The California Department of Food and Agriculture is responsible for the program which includes treatment of public land adjacent to cropland in the San Joaquin Valley. The Department and the Bureau, under a Memorandum of Understanding, are taking action to insure that the program does not adversely impact the species or its habitat (Section 7 Consultation, Environmental Analysis and Pesticide Use Proposal containing appropriate mitigation, etc.). Predator trapping and rodent poisoning activities on adjacent private lands may also be impacting the kit fox. It is not known to what extent this activity affects public lands."

Page 3-55, Air Quality, item number three, OSHA standards have been recently revised from two fibers per cubic center to 0.5 fibers per cc.

Page 3-57, Vegetation, The San Benito Mountain Natural Area was established in 1971.

Page 3-62, Sensitive, Rare, Threatened or Endangered Species, second sentence, delete the portion of the sentence in parenthesis.

Map 7, San Benito/Santa Lucia Deer Herd boundaries, should follow Salinas River from San Luis Obispo County Line to Monterey Bay.

CHAPTER 4 - ERRATA

Page 4-15, Table 4-5, Recreation, Alternative 2, change total use to 25,000 visitor hours, delete "and 5,000 fishing." Second sentence, first word change to "Decreased."

Page 4-26, Table 4-8, Recreation, Alternative 2, ORV use should be 225,000 visitor hours. Add as last sentence, "Decreased impacts to RTE plant habitat from reduction of camping use in Clear Creek Canyon."

Page 4-27, Table 4-8, RTEs and Vegetation, Alternative 1, first sentence, after "protection" insert "and enhancement."

Page 4-43, Table 4-13, Livestock Grazing, Alternative 2, grazing lease #4426 should be #4438.

Page 4-52, Table 4-16, Land Tenure, Alternative 2, delete and substitute "Improved access and manageability for recreation and other uses in the vicinity of Henry Coe State Park. Otherwise the same as Alt. 3."

Page 4-58, Table 4-17, Recreation, Alternative 2, total visitor hours should be 513,000 and fishing use should be 2,800 visitor hours.

Page 4-63, Mitigation Measures, Number 3, add "Seek to develop cooperative law enforcement agreements with the counties where possible."

APPENDICES - ERRATA

Page A2-2, Visual Resources, add under VRM classes, "Class 1 - Natural ecological changes and very limited management activity are allowed. Any contrast created within the characteristic landscape must not attract attention. This classification is applied to wilderness areas, wild and scenic rivers and other similar situations."

Page A2-3, Areas of Critical Environmental Concern, first paragraph, last sentence, substitute the word "property" for the word "safety."

GLOSSARY - ERRATA

Page G-1, Glossary - Abbreviations, top of list add "ACEC - Area of Critical Environmental Concern."

Page G-2, Glossary - Terms, add after "Archaeological Site," "Area of Critical Environmental Concern: An Area of Critical Environmental Concern (ACEC) is an area within the public lands where special management attention is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources, or other natural systems or processes, or to protect life and property from natural hazards."

REFERENCES - ERRATA

Page R-2, References, above "Bury et al, 1977," add "_____, 1983. Clear Creek sedimentation study, Bureau of Land Management, Hollister, California.

CHAPTER 5

CONSULTATION AND COORDINATION

Summary of Public Involvement

Consultation and coordination with the public and public agencies was a planned and integral part of the development of the management alternatives analyzed for this Draft EIS process.

Following is a summary of the consultation, coordination and public participation in the EIS process:

- Notice of Intent (NOI) to begin RMP published in the Federal Register and filed with the California State Clearinghouse on February 19, 1982.
- Preplanning analysis completed and available for public review and comment in June, 1982.
- Notice of Availability (NOA) of planning criteria published in the Federal Register and filed with the California State Clearinghouse on June 17, 1982.
- Notice of Intent amendment published in the Federal Register and filed with the California State Clearinghouse to include the entire Hollister Resource Area on July 27, 1982.
- Letters mailed to various local, State and Federal agencies to establish coordination meetings on August 4, 1982.
- Letters mailed to all parties on RMP mailing list and political delegation explaining RMP process, current and future stages, on July 30, 1982.
- Series of meetings held with affected local, State and Federal agencies during October, 1982.
- Amendment to previous NOA of planning criteria published in Federal Register on December 21, 1982.
- Follow-up information letter sent to "purged" mailing list (responses from July mailing), January 10, 1983. This letter provided information on the AMS/Alternative formulation process and solicited further input to be considered at that stage.

- A third follow-up letter sent to revised mailing list (consisting of all those on second mailing and a portion of those on original mailing who were considered valid for retention), March 1, 1983. This letter provided information on revised issues and announced the start of the Draft EIS and tentative time for public meetings to be held.

- The DEIS was filed with the Environmental Protection Agency (EPA) and an NOA was published on September 30, 1983. Additionally, on September 30, 1983, BLM published an NOA for the Draft EIS in the Federal Register.

- A 90-day public comment period was given ending December 31, 1983.

- Three public open house meetings were held November 1-3, 1983 in Hollister, San Jose and Fresno respectively.

Comments received at the three public open house meetings (a total of 87 people attended) were considered in the decision process. Generally these comments could be grouped as follows:

- ORV enthusiasts generally preferred Alternative 2 (Balanced Use) for the Clear Creek Area, some also endorsed Alternative 3 and 4. Most preferred Alternative 3 for the Sierra de Salinas and Pinnacles Management Areas.

- Hobby mineral collectors generally preferred Alternative 4 for Clear Creek. They also wanted to see mineral segregations continued and hobby collection areas protected from mining related activities.

- Ranchers and private landowners generally opposed increased recreation use (particularly in the Clear Creek and Pinnacles Areas). Most were neutral on sale of public lands. They felt if sales were necessary, adjacent landowners should have preference rights.

A number of telephone comments were also received and documented, including ten from local ranchers. Ranchers generally wanted clarification on range-related proposals (suitability adjustments and/or season of use, etc.). Other telephone comments were generally followed up in writing.

LIST OF AGENCIES AND ORGANIZATIONS TO WHOM COPIES OF THE EIS WERE SENT

In addition to interested individuals, comments on the Draft EIS were requested from the following agencies and interest groups (an asterisk(*) indicates those who responded to the DEIS).

ELECTED OFFICIALS

Federal

Leon Panetta - Representative*
Pete Wilson - Senator
Tony Coelho - Representative
Charles Pashayan - Representative
Alan Cranston - Senator

State

Rusty Areias - Assemblyman
Jim Costa - Assemblyman
Eric Seastrand - Assemblyman
Bill Jones - Assemblyman
Gary Condit - Assemblyman
Alfred Alquist - Senator
Ken Maddy - Senator
Henry Mello - Senator

GOVERNMENT

Federal

Environmental Protection Agency - Region 9*
National Park Service - Western Region and Pinnacles National Monument*
U.S. Forest Service - Los Padres, Sierra* and Sequoia National Forests
Soil Conservation Service - Gilroy, Salinas, Fresno
U.S. Fish and Wildlife Service (Endangered Species Office) - Sacramento*
U.S. Bureau of Reclamation - Fresno
U.S. Department of the Army - Fort Hunter Liggett

State

Office of the Governor
California Department of Fish and Game - Regions 3 & 4*
California Department of Forestry - Regions 4 & 5*
California State Historic Preservation Officer
Native American Heritage Commission
California Department of Water Resources
California Department of Conservation
California Department of Parks and Recreation*
Air Resources Board
Division of Mines and Geology
Division of Oil and Gas

Regional

Monterey Bay Unified Air Pollution Control District
Monterey Peninsula Regional Park District
Central Coast Regional Water Quality Control Board - San Luis Obispo
Central Valley Regional Water Quality Control Board - Fresno

County

County Planning Departments and Boards of Supervisors

Counties:	Alameda	San Benito*
	Contra Costa	San Joaquin
	Fresno*	San Mateo
	Madera	Santa Clara*
	Merced	Santa Cruz
	Monterey*	Stanislaus

Fresno County Parks and Recreation Department*
Fresno County Farm Advisor
San Benito County Farm Advisor
San Benito County Water Conservation and Flood Control District*
Madera County Farm Advisor

INTERESTED GROUPS/ORGANIZATIONS

Environmental

Natural Resources Defense Council
Sierra Club*
California Wilderness Coalition
California Native Plant Society*
National Audubon Society
The Nature Conservancy
The Wilderness Society

Livestock

Bakersfield Grazing Advisory Board
Hollister Resource Area Operators

Minerals

ASARCO, Inc.
Bunker Oil Company
Sohio Petroleum Company
Conoco, Inc.
Gulf Oil Company
Minerals Exploration Coalition
Atlantic Richfield Company*
Anaconda Minerals
Santa Clara Valley Gem and Mineral Society*
Monterey Bay Mineral Society
California Federation of Mineralogical Societies
Chevron USA, Inc.
Shell Oil Company
Western Mining Council
Union Oil Co.*
Black Hills Institute of GeologicalResearch*
Fossils, Etc.*

Recreation

California Association of Four-Wheel Drive Clubs, Inc.*
American Motorcyclist Association
Merced Dirt Riders, Inc.
M.O.R.E.
Salinas Ramblers Motorcycle Club*
National Outdoor Coalition
Mountaineers Motorcycle Club
Los Gatos Motorcycle Club
Ridgerunners Motorcycle Club
CORVA

Wildlife

Sportsmen's Council of Central California
Fresno County Sportsmen's Club*
Salinas Bowmen, Inc.
Salinas Sportsmen's Club
Southern Monterey County Sportsmen's Club
Mission Trail Bowhunter Association
San Benito County Fish and Game Commission

Native American

Big Sandy Rancheria
Fresno American Indian Council, Inc.
Sycamore Valley Association
Santa Rosa Rancheria
Table Mountain Association

University

James Clawson, University of California
James Griffin, University of California (Hastings Reservation)
John Hutchinson, University of California
Arthur Staebler, California State University, Fresno

Other

Pacific Gas and Electric Company*
FMC Corporation
Watson Telecommunications
Western Union Telegraph Company
Western Land Exchange
Southern California Edison Company*

INTRODUCTION TO RESPONSES

All letters were reviewed to determine if they met the required criteria for response, i.e., discussion of the adequacy of the DEIS. Substantive comments which presented new data, questioned facts and/or analyses, or commented on issues bearing directly on the DEIS of the environmental impacts of the alternatives were fully evaluated and given responses. Changes or additions have been incorporated into this final statement.

Comments and related responses are identified by the number of the comment letter and the number of the comment in that letter.

A total of 68 interested citizens, federal and state agencies, and private organizations submitted written comments on the DEIS as of December 31, 1983.

#1

JIM MARKS

Land and Cattle Company

206 SAN BENANCIO ROAD • SALINAS, CALIFORNIA 93905 • PHONE (408) 464-4128

October 10, 1983

Area Manager
Bureau of Land Management
P. O. Box 365
Hollister, CA 95023

Re: Hollister Resource Mangement Plan and Environmental Impact Statement

Gentlemen:

As an interested party we are making written comments under Proposed Action (Alternative 2). Specifically, we refer to recreational activities, including use of the Hernandez Reservoir.

You are already aware that recreational activity in the Clear Creek area has had a serious adverse impact resulting in:

a. Sedimentation of Hernandez Reservoir, a major water resource for the County of San Benito.

1-1 b. Damage to neighboring private property as a result of trespass by vehicle and motorbike traffic.

c. Danger to human health, safety and welfare because of firearms, fire hazards and known asbestos hazards.

d. Activities that endanger rare species of wildlife.

e. Visual destruction of a scenic resource.

1-2 The recommendation to provide public access to Hernandez Reservoir is a poorly conceived management plan and should be excluded.

page two

You may recall that the only land owned by the San Benito County Water Conservation and Flood Control District is an 88.52 acre parcel where the dam, spillway and discharge outlet are located. This area is entirely surrounded by private property. The balance of the reservoir is subject only to an easement to inundate and flood which covers private land and a minute portion of BLM land. The outer bound of the surveyed easement is elevation 2,407.5', which is 13.5' above the spillway elevation (2,394.').

1-2 The BLM area in question that contains 2 very small depressions within the lake easement area are in Lots 6 & 7, Section 6, Township 18S, Range 11E, MDM. One area contains 0.128 acre and the other area 0.213 acre. It is most likely that these 2 small portions are between the high water mark and the outer bound of the easement. In any event only a part would be inundated for a very short period in the Spring. Furthermore, the Hernandez Reservoir only fills up on average once every 3 years. Any person who goes beyond the west line of Lot 6 or the south line of Lot 7 further into the reservoir is then trespassing on private property.

Therefore, your estimates of fishing days could only be achieved by the public encroaching on private land. Let it also be clearly understood that we have absolutely no interest in exchanging land parcels that would provide public access to the reservoir. Already, those landowners with legal use of the reservoir are bound by a strict set of conditions and rules that limit individual activity.

The BLM has already created an attractive nuisance at Clear Creek and people and recreational vehicles are constantly trespassing on our private lands. Posting the area is ineffective. The only reaction we get from bringing this issue to the attention of local BLM officals is they don't have the resources to police the area and secondly, it has become our problem because the public are out of BLM jurisdiction once

they set foot on private lands. Our tolerance is wearing thin and creation of any more attractive nuisances that have negative externalities will have severe legal repercussions.

1-2 Cont. As an additional concern, access to the small lake portions would be approximately 5 miles through very rugged terrain. At one point the BLM corridor is only 1/4 mile wide. We believe a foot trail would need to be patrolled in order to exclude motor bikes and to stop trespass. This could require 2-3 full time officers at significant cost. Fire danger would be greatly increased in an area that is classified by the California Division of Forestry as "extreme" and has difficult access. The value of the grazing lease would be reduced by the public disturbing livestock. Areas of public and private lands are not segregated by fence or identified as such so trespassing would be a serious conflict of a much greater magnitude than presently exists in this area. Bullets from high powered firearms would also stray onto private property and be a significant risk. Trails on the fragile soils of the steep slopes will also lead to erosion with sedimentation occuring on private land and the Hernandez Reservoir. Public traffic will also destroy the serenity of the private lands and have a negative impact on wildlife.

We strongly recommend that any proposal to provide improved access from Clear Creek to Cane Canyon be excluded from consideration.

Sincerely,

Jim Marks

Jim Marks

Encl:

cc: Hernandez Estates
Rocky Lydon, Frank Sabbatini, Enos Silver, Henry Solorio, H. C
San Benito County Water Conservation and Flood Control Distric

Response to Letter No. 1

1-1 Under each Alternative arrayed in the Proposed RMP/EIS, the Bureau is and has been committed to mitigating adverse impacts resulting from recreational activities. See Errata for page 1-3 (Recreation Goal).

The Bureau has assisted private landowners with posting private land boundaries, warned users of the area about trespassing, issued detailed maps showing public/private land boundaries and cooperated in the construction of several miles of fence along the north boundary of the area. As a result, trespass use has been substantially reduced. The Preferred Alternative also addresses the acquisition of private lands at the entrance to the Clear Creek Recreation Area. These lands could be acquired through purchase or exchange. This would further reduce trespass onto private lands as well as reducing asbestos-related hazards and other environmental impacts associated with camping and staging activities in Clear Creek Canyon. The Bureau will continue to work with private landowners and law enforcement personnel to the extent possible in order to reduce the incidence of trespass in the area.

The Bureau completed off-road vehicle designations for the area (per Executive Order 11644) and an implementation plan in 1982. Prior to and since that time a number of actions have been undertaken to protect rare and endangered plants and deal with erosion problems. Such measures have included fencing, barrier construction and waterbarring of trails. A recent grant from the State of California will enable the Bureau to implement major portions of the implementation plan which will continue to reduce the asbestos hazard, effects of erosion/sedimentation and impacts to rare plants and other resource values.

1-2 At this point in time, it appears that development of a trail to Hernandez Reservoir is not viable because of the inefficiency of managing public use on such a small area of public land. Our Solicitor has also advised us that anyone (including private landowners in the area) must obtain the permission of the Water Conservation and Flood Control District before fishing in the reservoir as the District is the owner of the water.

The ultimate goal of enhancing recreation opportunities in the area north of Clear Creek remains. The Bureau will continue to pursue land exchange as a means of improving manageability as discussed in the Preferred Alternative for the Byles Canyon/Tucker Mountain area. Such an exchange would consolidate public lands, provide for improved recreation use, and help to reduce trespass problems resulting from the present scattered land pattern in that area.

#2

STEVE MARKS
458 FIRST STREET
WOODLAND, CA 95695
916 666 3321

October 13, 1983

Area Manager
Bureau of Land Management
P.O. Box 365
Hollister, CA 95023

Gentlemen:

We are writing this letter to inform you of our objections to your alternative number two.

Our major concerns are:

1) an unenforceable foot trail will soon be violated by motor bikes,
2) the area is not fenced and there will be trespass onto private land and private portions of the lake,
3) erosion on trails will add to sedimentation,
4) there is a severe fire hazard throughout the BLM areas,
5) the public will disturb livestock,
6) more poaching will occur,
7) the serenity of the area will be destroyed.

We strongly recommend that you adopt alternative number one.

Sincerely,

Steve & Anne Marks

Response to Letter No. 2

See the response to Comment 1-2.

#3

JAMES E. HOFF
3424 COUNTRY CLUB DRIVE
P. O. BOX 2568
EL MACERO, CALIFORNIA 95618

916-758-4706

October 13, 1983

Area Manager
Bureau of Land Management
P.O. Box 365
Hollister, CA 95023

Gentlemen:

We are writing this letter to inform you of our objections to your alternative number two.

Our major concerns are:

1) an unenforceable foot trail will soon be violated by motor bikes,
2) the area is not fenced and there will be trespass onto private land and private portions of the lake,
3) erosion on trails will add to sedimentation,
4) there is a severe fire hazard throughout the BLM areas,
5) the public will disturb livestock,
6) more poaching will occur,
7) the serenity of the area will be destroyed.

We strongly recommend that you adopt alternative number one.

Sincerely,

James & Katie Hoff
Jaklar Corporation

Response to Letter No. 3

See the response to Comment 1-2.

#4

Nickel S Ranch

785 Monterey Road • Salinas, California 93908 • (408)

October 17, 1983

U. S. Bureau of Land Management
Hollister Resource Area
402 Park Hill Area
P.O. Box 365
Hollister, CA. 95023

Dear Mr. Howell:

Because the Draft Resource Management Plan recommends the cancellation of our grazing lease due to high priority land sales, I would like to request that the Nickel S Ranch have first opportunity to purchase the land if it becomes available for sale.

4-1 We feel we are the only logical party having interest in the land and deserve first consideration for the following reasons:

1. The land is quite steep and brush-covered
2. There is no public access to the land
3. We are the adjacent land owner
4. We are the current grazing lessee

Please advise us of any future plans or sale possibilities regarding the land in our grazing lease as soon as possible.

Sincerely,

Laurie Scattini

Steven R. Scattini

OCT 1983
U.S. DEPT. INTERIOR
BUREAU LAND MGMT
HOLLISTER, CALIF.

Response to Letter No. 4

4-1 Lands identified for potential disposal in the Alternatives are those which were screened and considered for disposal to promote management efficiency. They would be sold at fair market value in a competitive or modified competitive procedure. Direct sales may occur where circumstances warrant. The concerns of adjacent landowners will be taken into consideration when a determination of specific sales methods is made.

#5

BAR-B RANCH

N. E. BURKETT, OWNER

—B BRAND

HERNANDEZ
SAN BENITO COUNTY
CALIFORNIA

October 21, 1983

Area Manager
Bureau of Land Management
P.O. Box 365
Hollister, Ca. 95023

To whom it may concern:

We have been informed of your studying the possibility of a five mile foot trail in Hernandez valley. We would like to go on record at being bitterly against any such trail.

We have owned land in Hernandez valley since 1934, and it is our hope in the near future to retire and enjoy the area, but if a trail as proposed were made and not supervised extensively we would be run over by motor bikes and poachers. There is far to much erosion of the land now and this would only add greater erosion on sedimentation to the lake.

We also have trespassing problems now, but a trail of this nature would force us to demand additional help in this problem. Besides disturbing the environment it would become a severe fire hazard.

Because of the above we sincerely hope that you will favor an alternative number one.

Very truly yours.

Mr. & Mrs. R.E. Burkett, Jr.

Response to Letter No. 5

See the response to Comment 1-2.

October 31, 1982

#6

Bureau of Land Management
Hollister Resource Area Manager
P.O. Box 365
Hollister, Ca. 95023

Subject: RMP and EIS Testimony

attn: David E. Howell

Dear Dave,

I am submitting these written comments in response to the Hollister RMP and EIS. My particular concern regards the proposed alternatives for Management Area 3, Sierra De Salinas.

If I had to vote for one alternative it would be Alternative 1, Maximum Protection, because it contains more of what appears desirable. However, it makes me uncomfortable because I do not believe maximum protection is appropriate on all issues listed. For example, I favor a more aggressive control burn program than is set forth under the "Fire Management" issue column for Alt. 1. It is hoped the final EIS and land use plans can somehow take the best alternatives for each issue in terms of BLM goals and objectives and blend them into a good plan, rather than be limited to one of the alternatives.

The main reason for recommending Alt. 1, Maximum Protection, is a belief that the Sierra De Salinas should not be opened up to greater recreational use. Page 1-5 points out the importance of maintaining the well-being of the individuals, families, and communities in the area. This priority should be maintained. Nearby and adjacent land owners have much more at stake and will tend to get more deeply upset and involved than the general public that is pressuring for a place to hunt and drive their ORVs. The general public can be just as effectively satisfied by expanding recreational uses adjacent to the Los Padres National Forest or the Ventana Wilderness Area. But the previously unbothered landowners bordering on the Sierra De Salinas will be tormented ~~by~~ if that area is opened up; and that will cause new problems for BLM.

6-1

A special concern we have is with the statements regarding easement acquisition. My family and I would strongly resist attempts to establish a public access over our property. The problems we have already had with the road over our property are enough to

6-2

cause us to oppose any further usage of that road.

It is my understanding that the planned control burn that we have all been working for was approved by BLM mainly as a measure to protect against Wildfires. It was secondarily for habitat improvement for wildlife being pushed uphill by foothill cultivation; and it was also for livestock grazing improvement. It would be disturbing to hear that our burn was later to be used as a reason for opening that land for general public recreational use and for easement acquisition. If faced with the choice I suspect that the landowners now supporting our burn would rather cancel it than face the disruption and property damage by those persons that a recreational use would bring in. I know I would. 6-3

Many of us have strong feelings on this point, Dave, and would like to see BLM's response be that neither this burn, nor the results therefrom, will be used as reasons or justifications for opening up the area. Support for future burns would quickly wane when other adjacent landowners learn of the scenario. ~~Again~~

Again, I would hope that if BLM

feels compelled to open more acres to recreational use that they be in areas where the public already has access.

Sincerely,

Victor J. Biniacca Jr.
709 Elmhorst Cir.
Sacramento, Ca 95825

Response to Letter No. 6

6-1 The intent of this proposed land use plan is to allow for the wise and judicious use of the public land resource. Appropriately, the plan must address the concerns of the public land users and adjacent private landowners.

Although there is a documented demand for recreation use in the area, it is quite correct to note that recreation opportunities are available on the adjacent Los Padres National Forest and that these opportunities might be expanded there.

Fiscal and policy constraints change with time as do demands and concerns. Opportunities for future management of the public land resource should not be precluded without consideration of the potential for change and demand. The presently proposed action for the Sierra de Salinas Management Area reflects existing and projected user demand. Implementation of any discrete portion of the proposed plan would necessarily have to address the aspect of appropriate funding and adequate control of such use (see Errata for page 1-3, Recreation Goal).

6-2 Easement acquisition would be subject to a full route analysis. Negotiation for a specific route would depend on that analysis and would not necessarily involve your property.

6-3 The prescribed burning program is in no way related to proposals concerning recreation use. The Bureau recognizes the need for implementing a sound fuels management and watershed protection program in the area and will continue to cooperate with concerned landowners and agencies to that end.

#7

RANKIN, ONEAL, CENTER, LUCKHARDT,
LUND & HINSHAW
SAN JOSE, CALIFORNIA 95115

November 1, 1983

Area Manager
Bureau of Land Management
P.O. Box 365
Hollister, California 95023

Re: Management Area #5

Dear Sir:

Please be advised that the undersigned is one of the owners of land adjacent to Hernandez Reservoir. It has come to my attention that the Bureau is considering alternatives which might include constructing a 5-mile foot trail, which would extend from the Clear Creek Recreational Area to the Hernandez Reservoir (Alternative #2).

As a landowner in the area, I am very opposed to this proposal because of the following concerns:

1. It would be extremely difficult to police the use of the foot trail, and in no time at all it would be violated by motor bikes, which could add to the severe fire hazard in the area.

2. The area is not fenced and there could be trespass upon private lands and private portions of the lake.

3. The public will disturb livestock and increased poaching will be inevitable.

4. Erosion on the trails will add to the sedimentation of the reservoir, which at the present time is severe.

4. The serenity of the area will be destroyed, and adjacent landowners will lose the benefit of their use and enjoyment of private property.

Should this trail be constructed by the BLM, it would constitute - in my opinion - a condemnation which could result in a substantial taking by the Bureau of private land.

For the reasons set forth above, as well as other reasons which I am sure you have in mind from other owners, the undersigned strongly recommends that Alternative #1 be adopted by the BLM as it pertains to this Management Area.

I would like to be put on the mailing list for any future public hearings, etc., which pertain to this Management Area. Please send all material to the address on the letterhead.

Very truly yours,

RANKIN, ONEAL, CENTER, LUCKHARDT
LUND & HINSHAW

ARTHUR K. LUND

AKL/njg

Response to Letter No. 7

See the response to Comment 1-2.

Your name has been placed on the mailing list for land use planning.

November 1, 1983 #8

TO: Bureau of Land Management

FROM: San Benito Water Conservation and Flood Control District

SUBJECT: Hollister Planning Area (Clear Creek)

In reviewing the Resource Management Plan and the Environmental Impact Statement of July 1983, especially that portion relating to the Clear Creek Area and Hernandez Dam area, the district finds several areas of concern. Taking this study along with the Clear Creek Sedimentation Study, dated September 1983 and prepared by the Bureau of Land Management, the district is concerned that the B L M has not shown enough concern for the problems that have been created by the intensive use upstream from the main water supply for the Hollister-San Juan Water Basin.

8-1 On page 2 - 19 the report contemplates trails and roads being constructed on public lands to Hernandez Dam for public use. Hernandez Dam Reservoir is on private lands. There is only a flood easement. The 87 acres owned by the district for the Dam, outlet works and spillway is too sensative an area to even contemplate ORV use in that area. The water level fluctuates with the season, and in most years the dam does not fill to capacity. To hold out the possibility of recreation at the reservoir is a myth. Although B L M land seems to touch the reservoir at two points, it appears that this will occur only at the maximim level of the dams capacity. It appears to the district that trails and roads leading to these two points will only lead to trespassing on private property, trying to use district owned land for ORV use, thus leading to potential hazzards to the district owned facilities and confrontation between the ORV people and the land owners. It is the districts wish that the proposed trails and roads that would lead to the Hernandez Dam and Reservoir site be eliminated.

8-2 On page 2 - 21 there is reference made to road and fireline construction on slopes not to exceed 50%. The district is concerned at this figure. In 1979 the Regional Quality Control Board used the figure of 30% slope to control non-engineered earth disturbance. The only exemption was for agriculture.

The County of San Benito incorporated this regulation in their General Plan. The district feels that the 30% slope figure should be used even though the construction will be on B L M land. The districts preference would be that no more roads or trails be constructed in the Hernandez Dam Watershed.

8-3 Page 4 - 63 and 4 - 66 relate to erosion. 4 - 63 speaks of check dams and erosion control where possible. 4 - 66 states that there will be an acceleration of soil erosion due to prescribed burning, ORV use, and mining. It appears to the district that before any more erosion of soils is promoted that no further work should be done in those areas where positive erosion control cannot be accomplished.

8-4 Regardless of the B L M's sedimentation report the district is sure the accelerated sedimentation of the Hernandez Reservoir is due in large part to the increased use of the Clear Creek area.

8-5 It is the districts feeling that the sedimentation study undertaken is not an adequate evaluation of the situation concerning the effect of ORV use in the Clear Creek area for the following reasons:

1. The actual field study was for less than two years.
2. Many study stations could not be monitored due to excessive rainfall and runoff.
3. Lack of information on rainfall. To use the Pinnacles and Panoche Valley rainfall information for the Hernandez area is ridiculous. Although not official weather stations, the district is sure that by asking Mr. W. Gates, below the reservoir and Mr. Herman Akers above

the reservoir, a much more accurate evaluation could have been made of the rainfall in the area.

4. Roads, crossings and mining operations existed in the area before the Dam was constructed, and the district is sure that the Udall - Creegan - D'Angelo study took into consideration these factors in their determination as to length of the life of the permanent pool at Hernandez Reservoir. The only factor not present, at the time of the study, was the intensive ORV use in the area.

8-5 Cont.

5. It is obvious that the 1981-82, 1982-83 rainfall and runoff were the exception not the rule. The permanent pool had disappeared prior to these tremendous runoff years. Jim Marks, John Eade and George Thomas, Manager of the district, can verify this statement from actual visual evidence to the lost pool.

It seems to the district that the burden of proof that the ORV use is not damaging the Hernandez Reservoir should be on the B L M. As for paying the costs of resurveys, gaging stations, etc., this seems to the district a proper use of ORV funds. The district feels that this use has contributed to the early demise of the 500 A/F permanent pool.

In conclusion the district requests that no further increase in trails, roads, or facilities be considered in the sensative Clear Creek area. By the statements in the B L M reports this area is highly prone to erosion with sedimentation of streams and lakes as a result, therefore the district is asking that no increase in use of the Clear Creek area be contemplated or promoted by the B L M.

8-6

George Thomas
Manager

Response to Letter No. 8

8-1 See the response to Comment 1-2.

8-2 The 50 percent figure used pertains to the slope of the mountain or hillside rather than the grade of the road. Bureau policy limits roads to a 12 percent maximum grade and this is only for short distances. Must road or fireline construction would be for prescribed burning (an agricultural use). These roads or firelines would be waterbarred and/or rehabilitated after the intended use. If the District's preference would be that no more roads or trails be constructed in the Hernandez Reservoir watershed, does this apply to private lands as well?

8-3 Mitigation Measure No. 4 recommends the use of check dams or other erosion control measures where practical not where possible. On page 4-66, it is stated that any accelerated soil erosion would be irreversible and irretrievable. It does not state that soil erosion will be accelerated due to surface disturbing activities. Furthermore, the sedimentation study recommended (consistent with the Preferred Alternative) that sediment control structures should be constructed but after the reservoir is resurveyed and gauging stations have been installed.

8-4 The present erosion, sediment transport, runoff, mass wasting and water quality impacts occurring in the Clear Creek watershed appears to be based on a combination of factors and an interaction of: naturally occurring soil-vegetative conditions, previous mining history, serious road washouts and lack of proper culverts/drainage provisions and ORV use.

8-5 The Bureau of Land Management recognizes the limitations of their "Clear Creek Sedimentation Study." The agency is well aware of the variability in water quality and sedimentation coming from the Clear Creek watershed, based upon extensive field work and resource inventories performed there.

The Clear Creek sedimentation study was never designed to be a completely defensible, scientific evaluation of siltation and erosion problems associated with the effect of ORV use in the Clear Creek Area. However, we do feel the report did provide some useful data and recommendations which can be used in the development of Best Management Practices to be included in the watershed appendix to the ORV implementation plan.

Hopefully, the recent installation of a telemetering precipitation gauge by the California Department of Water Resources near Spanish Lake should provide valuable rainfall information. The draft study used official rainfall records from the Pinnacles National Monument and the Priest Valley climatological stations to estimate rainfall for the Clear Creek Area, not from the Panoche Valley. The BLM Denver Service Center staff made two independent Pacific Southwest Interagency Committee (PSIAC) sediment yield factor ratings on the 15.91 square mile Clear Creek watershed and found the Udall-Creegan-D'Angelo study to be valid. They also felt that the erosion and sediment processes taking place in the Clear Creek watershed were not behaving significantly different than from the entire San Benito River basin.

The question of ORV use in damaging the Hernandez Reservoir is still unanswered. We feel that the Reservoir should be resurveyed and two U.S. Geological Survey (USGS) gauging stations cooperatively installed with BLM funding and maintaining one station at the mouth of Clear Creek and San Benito County funding and maintaining the other station on the San Benito River (just upstream from the confluence with Clear Creek). These actions are needed in order to determine how much sediment has accumulated in the reservoir as well as where it is coming from and how much is coming into it at the present time. These actions are necessary prior to any plans for construction of sediment control structures.

Land management agencies are very often faced with managing uses of large blocks of public land. These lands often are located in complex physiographic, hydrologic and ecological settings. Bureau policy is to do its best in learning the history of land use, resource constraints and productive capability of such lands. Eventually decisions must be made by the federal land manager which may maximize one land use benefit over another, while holding environmental impacts within tolerable ranges.

A practical point is always reached in a budget-limited setting where the complex system (such as Clear Creek) must be positively managed using the very best management practices and common sense.

In the case of the Clear Creek Area, the Bureau has analyzed management alternatives, involved the various publics, and will proceed to implement a management philosophy using the best available technology.

We invite the participation of the Water Conservation and Flood Control District in the development of appropriate erosion control measures.

8-6 Present and proposed plans and development for the Clear Creek Area are primarily for the purpose of mitigating environmental impacts and trespass problems resulting from recreational activities. Such developments are not for the purpose of promoting additional use. On the contrary, ORV use will be restricted in the more sensitive portions of the area, including the closure of highly unstable or seriously eroding areas. Also see the response to Comment 1-1.

#9

Board of Supervisors

SAN BENITO COUNTY
Room 204, Court House
HOLLISTER, CALIFORNIA
95023
Telephone 408-637-4641

FRANK J. SABBATINI
1ST DISTRICT
HOLLISTER
ENOS N. SILVA
2ND DISTRICT
SAN JUAN BAUTISTA
HENRY SOLORIO
3RD DISTRICT
HOLLISTER
ROCKY LYDON
4TH DISTRICT
TRES PINOS
HAROLD J. CERRATO
5TH DISTRICT
HOLLISTER

JOHN R. HODGES
COUNTY CLERK AND EX OFFICIO
OF THE BOARD OF SUPERVISORS
408-637-3786

November 1, 1983

TO: Area Manager,
Bureau of Land Management

FROM: Board of Supervisors,
San Benito County

SUBJECT: R.M.P. & E.I.S. for Hollister
Planning Area (July, 1983)

9-1 1. The County of San Benito will object to any plan by the Federal government (BLM) which would encourage increased recreational use of BLM land within this county until BLM has in place the support measures and personnel necessary to protect neighboring private land owners from such activities, and can provide the required public health and safety services for the people it attracts.

2. For public health and safety, and because of financial constraints, the Board of Supervisors may soon find it necessary to consider the abandonment of that portion of the Clear Creek Road situated upon Federal land. Therefore, BLM should be considering budgeting the necessary funds for its improvement and maintenance.

ADOPTED BY motion 3:10 P.M. NOV 1, 1983.

Response to Letter No. 9

9-1 Under each Alternative arrayed in the Proposed RMP/EIS, the Bureau is and has been committed to mitigating adverse impacts resulting from recreational activities. See Errata for page 1-3 (Recreation Goal). Implementation of any proposal would be in concert with existing and projected fiscal capability in order to effect sound management and at the same time be a good and responsible neighbor.

Hollister Resource Management Plan
and EIS Summary

#10

W.T. Gates

Nov. 1, 1983

- General Observations:
  - Acres suitable and potentially suitable for livestock grazing can only be established by on-site inspection.

10-1
  - Copy of full document (RMP) was not available here at King City Public Library on 10/28/83, as indicated in the Summary.

  - We determine "Season of use" each year, based on conditions, and we feel this cannot be accurately determined from BLM office.

- Specific Objections:
  - Our lease #4334 AUM's will be increased nearly 5 times from 50 to 233, under BLM Proposed Action (Alt. 2). We feel this is an unfair increase.

10-2
    - Partially due to classification of total 1471 acres as suitable (1266) or potentially suitable (205)

      - Practical use indicates about 25% not suitable

      - BLM representative (Terry Bridgeman) came to ranch on 12/31/75, agreed with our analysis

- Specific Objections (Cont.)

10-2 Cont.
  of no forage value of portion of leased lands, and suggested dropping this area from the lease. He, or his replacement, if he moved, was to return the following spring for a more extensive range survey - no one ever came.

  - When the lease was assigned to us, we were asked how many head we expected to run in the entire operation (cows, calves, bulls & yearlings) - we said about 200. We believe this generated the original 199 AUM's, but at no time did we ever intend to run our entire herd on the leased BLM lands

- "Season of Use" would not be practical in our operation
  - We manage grazing on the leased BLM lands the same as we do on our owned lands, according to forage available at any given time and other conditions

10-3
    - We submit that this can be done better by someone on the land, particularly if "Season of use" is determined in advance by BLM. It is not unusual for the period of use to change each year.

Specific Objections (cont)

- Increased ORV use of public lands under Proposed Action (Alt. 2)

10-4 - We object to destruction caused by ORVs on public lands (erosion and sedimentation, plants, animals), nicely detailed in BLM Draft Environmental Assessment Off-Road Vehicle Designation, Clear Creek Recreation Area, 1981.

  - We believe this use should be reduced - not increased.

10-5 - We object to access to Hernandez Reservoir by one group when it is closed to the general public. ORV use becomes an exclusive use, thus limiting opportunities for recreation by others.

- Increased opportunities for hunting, Proposed Action (Alt. 2)

  - Ranchers problems with hunters under present BLM management are excessive (trespass, poaching, irresponsible shooting, and property damage)

10-6 - We suggest that no additional hunting opportunities be allowed until BLM can effectively supervise and control.

Response to Letter No. 10

10-1 A copy of the document was sent to the King City Library on September 23. The library had inadvertently misplaced the document so it was not on file the day of your visit. When brought to their attention, it was promptly filed and available for review.

10-2 Adjustments to grazing use levels will not be made unless monitoring indicates a need for change or a mutual agreement with the grazing lessee can be reached. Any changes will be verified by on-the-ground inspection with each lessee.

10-3 Season of use agreements will be reached mutually with each grazing lessee taking into consideration the nature of the operation, resource needs and practicality. Basically, leases consisting of scattered public land will be managed custodially (no season of use, minimal expenditure of Bureau funds in range improvements, etc.).

10-4 See the response to Comment 1-1.

10-5 See the response to Comment 1-2.

10-6 See the response to Comment 9-1.

#11

Hernandez Estates

206 SAN BENANCIO ROAD • SALINAS, CALIFORNIA 93908 • (408) 484-1128

November 1, 1983

Area Manager
Bureau of Land Management
P. O. Box 365
Hollister, CA 95023

Re: Hollister Resource Management Plan and EIS Summary

Gentlemen:

We are owners of over 7,500 acres in south San Benito County where BLM lands are also interspersed.

Following are our comments on the R.M.P. and E.I.S.:

1. Entrance to Clear Creek recreation area.

The public must pass through 2 of our parcels when entering the Clear Creek Area. We have these parcels for sale. One of these parcels has been reduced to unsaleable condition as a result of trespass, camping and motorbike trails caused by
11-1 the public. They have ignored all posted signs and show total disrespect for private property. This has had a serious negative impact on our operation and is something we do not want to see perpetuated or increased.

2. Foot Trail to Hernandez Reservoir.

We own a significant area of deeded land that is subject to the inundation easement and also adjoins BLM land. We are
11-2 totally opposed to opening up a foot trail because it would cause trespass onto private lands and conflicts that have infringed on our rights as property owners. It would take

approximately 20 miles of fence throught rugged terrain to define the property boundaries and another 2 full time rangers to police the area. After all we already know that a posted fence is not an effective deterrant.

3. Areas NW of Hernandez Reservoir.

11-3 We are totally opposed to providing any easements for the public through any of our private lands.

4. Areas along Laguna Creek.

We own approximately 500 acres south of the County road in this vicinity. There are also other private landowners
11-4 (Massolo, Eade, Tully, and Burkett). These areas are already subject to severe trespass and poaching. Any increase in public activity would require fencing and patrolling as mitigating measures.

In reviewing the draft document we feel that increasing public activity in the area will greatly increase the conflicts that currently exist. We therefore recommend the BLM draft Alternative I with increased policing.

Sincerely,

Clive Drew
Partner

CD/ie

Response to Letter No. 11

11-1 See the response to Comment 1-1.

11-2 See the response to Comment 1-2.

11-3 Neither the Preferred Alternative or other alternatives considers the acquisition of easements for public use in that area.

11-4 The Bureau is presently pursuing land exchange as a means of resolving trespass problems in that area. The Bureau is also cooperating with the California Department of Fish and Game and adjacent landowners to construct and post a boundary fence in the area.

Britalia Motors

#12

385 Tully Rd
San Jose, CA 95111
Across from the
Fairgrounds

Comprehensive stock
of parts
shipped UPS daily
(408) 295-4341

September 29, 1983

Bureau of Land Management
800 Truxtun Avenue, Room 301
Bakersfield, CA 93301

Dear BLM:

Thank you for sending us your Hollister Resource Management Plan and E.I.S. Summary. As the Clear Creek area exists now (Alt.4), the area has proven popular with OHV recreation enthusiasts. It appears to us that Alternative # 3 to maximize use of the area would benefit the most people. Alternative # 2 for balanced use would be acceptable, but less desireable. Alternative # 1 would be a severe setback.

We vote for Alternative # 3. Thanks for the chance to make our views known!

Sincerely,

John McCoy

MOTO GUZZI DUCATI Norton TRIUMPH BSA

Response to Letter No. 12

Thank you for your comments.

#13

Frusetta & Co. - Cattlemen

ANTONIO FRUSETTA (1853-1930)
A Native of Switzerland
GEORGE FRUSETTA (1886-1968)
FRANK FRUSETTA (1890-1969)
PAT H. FRUSETTA (1921-1957)
PETER C. FRUSETTA (1932-)
GEORGE P. FRUSETTA (1955-)
ROBERT M. FRUSETTA (1960-)
JACK C. FRUSETTA (1962-)

FRANK PETRONOVICH, San Benito, Calif.
FRANK VIERRA, Firebaugh, CA
PORFILIO PINA, Syncline Ranch

Los Banos.
11-1-83

Dear Mr. Howard,

As I see it plan no. #3 would + is opposed by me. I would not like to see any more recreation especially hunting on BLM lands in our county.

Plan #4 they tell me keeps things as they have been going. This sounds best. I convey this as I'm unable to attend the meeting at the High Sch.

Regards. Peter Frusetta

Response to Letter No. 13

Thank you for your comments.

#14

November 3, 1983

Area Manager
Bureau of Land Management
P. O. Box 365
Hollister, CA 95023

Gentlemen:

As a private landowner in the Hernandez Reservoir area, I am writing in opposition to a proposal to construct a foot trail from Clear Creek to Hernandez Reservoir.

We purchased property in that area for its peace, quiet, privacy and pollution free setting. A foot trail could soon degenerate into a dirt bike or other path and could severely impact the area with additional erosion, trespassing, poaching and increasing fire hazards.

I would recommend adoption of Alternative #1 on Table 2-5 of the management of Area 5.

Very truly yours,

Hugh L. Clinton

HUGH L. CLINTON

1150 Hillsdale Avenue
San Jose, CA 95118

HLC:lc

NOV 1983
U.S. DEPT. INTERIOR
BUREAU LAND MGMT.
HOLLISTER, CALIF.

Response to Letter No. 14

See the response to Comment 1-2.

#15

6415 Regent Street
Oakland, California 94618
11 November 1983

David Howell
Hollister Resource Area Manager
Bureau of Land Management
P.O. Box 365
Hollister, California 95023

Dear Mr. Howell:

I am commenting herewith on the draft Resource Management Plan and EIS for the Hollister Resource Area.

Preparation of this document was a huge task upon which your staff is to be complemented. Its very magnitude, however, leads to frustrations in using the resulting document. Of necessity, it is long on generalities and short on specifics, having, as it does, to include information on sixteen different
15-1 Management Areas. A separate, more detailed treatment of each MA may have been impossible, but is certainly preferable from several perspectives. There are several questions that reference to the maps in the draft RMP cannot resolve due to their scale and the screening that makes place names poorly legible when examined under magnification. And without better information as to the details of the present ORV designation for MA #8, Clear Creek/Condon Peak, one cannot make detailed observations upon the chosen alternative of "no change". My comments will focus upon MA #8.

As you know, one of my primary interests is the vegetation and especially the rare plants of this extremely unusual ultramafic area. It would appear that erosion of the soils occurring here, especially along the Clear Creek drainage where ORV activity concentrates, is a serious problem. A high rate of deposition of sediment into Hernandez Reservoir is attributed to this.
15-2 Streamside vegetation along Clear Creek is being seriously affected, and a native fishery appears to have disappeared.

Highly erodable soils with little or no vegetative cover would logically preclude ORV use. Your staff asked for help at the public meeting in San Jose in preventing and/or reducing erosion, but it seems that a miracle is wanted. Preventing erosion and continuing ORV use seem to be incompatible goals.

I commented upon a previous occasion that the area was not as devastated as I had feared. But why wait until matters are much worse? Surely continued
15-3 decline has occurred in the two and a half years since my visit as ORV use has continued and increased. Once eroded away, soil can be restored only over geological time intervals. And the usual methods of rehabilitation with vegetation are likely to be even less effective in a region of such sterile soil.

15-4 Staff admits that various kinds of violations take place commonly and that little can be done to prevent this because law enforcement personnel are lacking. The public knows this, too. The consequences are disregard for management rules. Existing signs suggest withdrawal of usage privileges if signs and fences are not respected. But have any privileges been withdrawn? Or is this, too, an empty threat attesting only to the effeteness of BLM's enforcement capabilities? These considerations seem to be of serious concern throughout the state and cry out for remedy.

15-5 Given the circumstances, it would seem foolhardy to plan any activity or facility that would concentrate human activities near any sites of importance. Yet the ORV designation apparently does just that by placing campgrounds close to habitat for endangered species and by designating "free play" areas also nearby.

15-6 Both the rare plants, Camissonia benitensis, now formally proposed for listing, and Layia discoidea, are annuals whose populations fluctuate in both size and location from year to year. Fencing demarcates only currently occupied habitat and surrounding areas are accessible to practioners of an activity that results in extreme erosion. I foresee a future time at which the soil substrate for the endangered species will all have disappeared if for no other reason than the action of gravity in relation to nearby gullies. All other potential habitat may likewise have disappeared down Clear Creek and into Hernandez Reservoir. I am reminded of a photograph I saw several years ago of a striking scene in Lebanon where forests of cedars had long since been cut but still grew in an ancient cemetery that, as a consequence, stood about three feet above the surrounding barren fields. The well-vegetated cemetery had resisted erosion that had laid waste to the fields nearby. At Clear Creek even the vegetated areas are comparatively barren and would offer little resistence to erosion.

15-7 I am inclined to believe that the only rational course of action is to remove ORV activity from Clear Creek Canyon before it is too late. I admit that this presents great social problems. However, ORVs were removed from the Panoche Hills.

15-8 It is disappointing that the results of Prof. Hans Jenny's two trips to Clear Creek did not enter into the draft RMP. Comments about the extraordinary soils and recommendations for areas to be preserved from the onslaughts of ORV use were sent to you. Yet the main discussion of the soils relates to their being a hazard from the high asbestos content. The samples collected by Prof. Jenny came from three different areas and were strikingly different. Mere preservation within the Natural Area is not sufficient. I am glad to learn of a proposed extension of this Natural Area but cannot relate it to anything decipherable on the maps provided.

Sincerely,

Alice Howard

Alice Q. Howard

Response to Letter No. 15

15-1 We realize that the format of the RMP/EIS is broad in scope. Separate activity plans will be prepared at a later date addressing specific management actions. These activity plans will require more thorough, site-specific environmental analysis. Details of the ORV designation are included in the Clear Creek ORV designation EA and implementation plan sent to you earlier.

15-2 These issues were primarily dealt with in previous planning efforts. The Clear Creek ORV designation and implementation plan, prepared in 1982, calls for measures designed to restrict ORV use in sensitive areas.

The designation and implementation plan, when fully implemented, will substantially reduce ORV use in the Clear Creek Canyon corridor and the San Benito Mountain Natural Area. As a consequence, the majority of areas that constitute viable rare plant habitat (particularly for the San Benito evening primrose) will be protected. The major provisions of the plan call for installation of barriers to limit camping/staging to designated areas, provide routes to "funnel" use out of the canyon, protect both known and potential sensitive plant habitat as well as riparian habitat and close severely eroding hill climb areas. Another major provision of the plan is to upgrade the Clear Creek Road by installing concrete stream crossings. These measures will help to reduce direct and indirect impacts from sedimentation and flooding. Road improvements and barrier construction are scheduled for fiscal year 1984 and 1985.

A watershed appendix to this implementation plan is also scheduled for completion in 1984 which will outline Best Management Practices for erosion control, rehabilitation or stabilization of severely eroding hill climb areas and monitoring measures.

15-3 ORV use has actually declined 25 percent from 1977 to 1982. Fence and barrier installation has continued in the two and a half years since your visit to the Clear Creek Canyon. There are now nine rare plant exclosures and several severely eroded hillsides being protected. The recent OHV grant will allow us to fully implement protection measures called for in the implementation plan. This grant is funded by ORV enthusiasts themselves under the Chappie-Z'Berg Off-Highway Motor Vehicle Law (1971).

15-4 BLM special agents and law enforcement Rangers now have the authority to issue citations in all public land areas. Two cases of sign theft and two cases of vehicle use in a closed area (San Benito Mountain Natural Area) were successfully prosecuted in 1983 as a result of one visit by a BLM special agent. We plan to increase our utilization of law enforcement personnel in the future. The Bureau is also presently working with San Benito County to establish a cooperative law enforcement agreement that will enable Sheriff's deputies to enforce Federal Regulations. It should be noted that not one rare plant exclosure has been vandalized since the first one was erected in 1977.

15-5 There are only two designated "free play areas" (barren hills) in the canyon bottom proper. Only one is near a known population of the San Benito evening primrose. Only two of the camping areas are located near known evening primrose locations. These rare plant habitat areas will be closed to vehicle use by barriers. A corridor in the canyon bottom is limited to designated routes with the purpose of diverting heavy use out of the sensitive canyon bottom and into the upland areas. The Preferred Alternative also addresses acquisition of private land parcels at the entrance to Clear Creek to reduce camping/staging activities in the canyon.

15-6 The Bureau has (under its "sensitive" plant policy) been managing these plants as endangered since 1980. It is our intention to continue, on a yearly basis, monitoring and protection of sensitive plant habitat and populations in the area. We realize that these populations are mobil, however, the habitat is not. It is our policy to protect habitat, both known and potential. We will use the information from monitoring studies to identify and prioritize areas that need further protection.

The Preferred Alternative also considers designation of the serpentine area as an Area of Critical Environmental Concern (ACEC). The ACEC designation would place special attention on management of the sensitive plant habitat, critical soil and watershed concerns and the asbestos hazard. The ACEC would also be an important vehicle for securing future funding.

15-7 The present and proposed course of action in Clear Creek is the result of many years of planning and consultation with concerned agencies, groups and individuals. The use of Clear Creek by ORVs resulted largely from closure of the Panoche Hills in 1970. There is a strong demand for ORV use which will not decline if the area was legally closed. Enforcement of such a closure would be next to impossible. Unregulated use would be likely to continue, with serious environmental consequences, or become a problem elsewhere.

15-8 Dr. Jenny's comments on soils were incorporated in the Final Environmental Assessment, ORV Designation, Clear Creek Recreation Area (1981). We are still interested in designating and protecting site-specific study areas for these unique soils. This direction has been incorporated into the ACEC element for the Clear Creek Serpentine Area (see Chapter 2, Errata). The Natural Area extension is included in the area designated on Map 2 contained in the DEIS. The Natural Area and proposed extension are also shown in much greater detail on the maps included with the Clear Creek ORV designation EA and implementation plan.

#16

Michael J McNaughton
P.O. Box 216
Patterson, CA 95363
November 3, 1983

Dennis Johnson
Bureau of Land Management
P.O. Box 365
Hollister, CA 95024

Dear Mr Johnson:

16-1 Pursuant to our recent phone conversation I am writing in regard to the BLM land that I currently lease in Santa Clara county (copy of original application and your mailer enclosed). I am hereby simply reiterating my desire to continue to use the land for cattle grazing either by lease or, if possible, by purchase. You indicated tenative plans by BLM to dispose of the property and I would be interested in such a purchase.

In addition I would like to inquire as to the advisability of obtaining an easement for right-of-way ingress & egress purposes through a very short stretch of road which goes through a portion of the BLM land I have. I would appreciate it if you could send me the necessary application papers.

Many thanks for your cooperation and help. I look forward to hearing from you.

Sincerely,

Michael J McNaughton

NOV 1983
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BUREAU OF LAND MGMT.
HOLLISTER, CA.

Response to Letter No. 16

16-1 See the response to Comment 4-1.

#17

November 3, 1983

Area Manager
Bureau of Land Management
P.O. BOX 365
Hollister, Calif. 95023

To whom it may concern;

I have been informed that a 5 mile foot trail is being proposed in the Hernandez Valley. I'm NOT overwhelmed with the idea.

It's bad enough now with poachers and trespassers, which the county cannot control. Adding an easier entry to the land and will only worsen these problems.

We have livestock in the area and also crops, which will be disturbed especially during the summer months. The fire hazard will be even more serious with careless nature going population.

Why add another trail when motorcylces will not obey rules and regulations. It will be abused just like the Clear Creek recreation area.

I sincerely hope you see our reasoning against the foot trail.

Sincerely,

Richard R. Burkett

RRB/jmc

Response to Letter No. 17

17-1 See the response to Comment 1-2.

#18

November 15, 1983

Bureau of Land Management
Park Hill
Hollister, CA 95023

Gentlemen:

We are writing in order to have our views on the recent BLM proposals on record. As property owners with approximately two to two-and-a half miles of property bordering BLM land near the Pinnacles, we are strongly opposed
18-1 to the BLM's opening the approximately one thousand acres adjoining us for further use--for either hunting and/or 'primitive camping.'

The land in question is rugged and arid. Boundaries are very irregular. There is no feasible way that our private property can be protected. Posting boundary markers is certainly not going to stop hunters from crossing onto private property, especially since any wildlife must come to private property for water. It would take a constant patrol to assure that hunters did not trespass, and we are not under the impression that the BLM plans to devote a man full time to this 1000-acre parcel. Furthermore, 1000 barren acres is not a large enough piece in our opinion to constitute a viable public hunting area.

It is disconcerting to note that the Free Lance quoted Mr. Florence of BLM as stating that 'the BLM is not proposing a large-scale hunt. It would be limited, perhaps to 10 hunters a year....' In my conversation with Mr. Lehman of BLM on November 9th, he said that the proposal was for limited hunting--perhaps 50 or 60! Where's the truth? Where are the assurances?

Furthermore, the plan allows 'primitive camping.' That means campfires (whether in rings or not is immaterial). During the summer months South County
18-2 lives in constant fear of fires. In the seven years we have lived here, there have been two large fires on our ranch alone. At Pinnacles Campground, which is 'improved camping,' and constantly supervised, we no longer allow any wood fires during the summer months. We are against 'primitive camping.'

Additionally, for the record, we are opposed to further development of the Clear Creek area as we have been all too aware of our neighbors' problems with trespassing on private property. One BLM agent patrolling 13,000 acres is obviously ineffective.

18-3

Finally, we are in agreement with the Board of Supervisors in that until the BLM can demonstrate and guarantee total safeguards for the property owners, and assure that these safeguards will be pursued, we are unequivocally opposed to further accessibility to these lands.

Sincerely yours,

Stuart K. Kingman

Stuart K. Kingman

Peggy Kingman

Peggy Kingman

cc: Rocky Lydon
Free Lance

Response to Letter No. 18

18-1 At this point in time, it appears that the aspect of hunter access is not viable due to National Park Service policy and procedural requirements for implementation. It would, however, be inappropriate to preclude this as a possible future management opportunity. This aspect will be carried forward for possible future implementation, but only in concert with all parties concerned - National Park Service (NPS), private landowners, Department of Fish and Game, Department of Forestry and the Bureau of Land Management. Controlled hunting access could be provided via a lottery system which would allow a small number of individuals access to a specific area or areas. The exact areas and number of hunters would depend on a mutual agreement by all parties concerned. Posting such an area or areas would be the responsibility of BLM. Such a lottery could be limited to a few weekends or week days during deer season only. This would greatly limit the potential for conflicts with adjacent landowners. The California Department of Fish and Game considers this a viable proposal and has indicated their willingness to assist in the administration and enforcement of such a lottery. Although the lottery would allow only a few individuals the unique opportunity of a specialized hunting experience, thousands of potential hunters statewide would have the opportunity to apply.

In the interim a cooperative agreement will be pursued with the NPS to enhance hiking opportunities on adjacent public lands as these parcels already have legal public access through the Monument. Additionally, an intensified awareness program will be initiated to educate the public land user as to private/public land boundaries, location, legal accessibility and responsibilities. The agreement will be consistent with the management goals of the Monument's Master Plan.

18-2 Primitive camping is generally not precluded on public lands. The cooperative agreement to be developed with the NPS will address the aspect of primitive camping and any problems that may occur. Current Bureau regulations allow for closure in areas of high fire danger or prohibition of open fires when necessary.

18-3 Proposed developments at Clear Creek are primarily for the purpose of mitigating environmental impacts and trespass problems resulting from recreational activities. Such developments are not for the purpose of promoting additional use. On the contrary, ORV use will be restricted in the more sensitive portions of the area. Also, see the response to Comment 1-1.

#19
Department of Planning and Development
Office of Planning
County Government Center, East Wing
70 West Hedding Street
San Jose, California 95110
(408) 299-2521

County of Santa Clara
California

November 21, 1983

Mr. David E. Howell
Hollister Resource Area Manager
Bureau of Land Management
P. O. Box 365
Hollister, CA 95023

Subject: Draft EIR/Proposed Resource Management Plan for the Hollister Planning Area

Dear Sir:

Thank you for the opportunity to review the Draft EIR. We request that the following topics relating to environmental impact be evaluated in the EIR in regards to "Management Area 16 - South Bay" in Santa Clara County.

Page 3-31: Table 3-14 -- Water Quality of Streams in the Planning Area.

The following streams in the Santa Clara County are not listed nor addressed in the EIS. They may be impacted by changes in the federal lands (e.g., erosion) and should be addressed.

19-1

- Coyote Creek (Coe Park is in the watershed)
- Pajaro River
- Pacheco Creek
- Llagas Creek
- Uvas Creek

Page 3-17 and 3-71 - Sensitive, Rare, Threatened or Endangered (RTE) Species

On Page 3-17, it is stated, Management Area 16 was excluded from the field inventory of plants that was performed in 1982. Then on page 3-71, it is stated under Sensitive, Rare, Threatened or Endangered Species. "There are a high number of sensitive plant species that occur in the Management Area (see Table 3-12). None are presently known to occur on public lands; however, the potential is unknown at the present time (but likely to be quite high for some species known to occur on similar habitat nearby)". Wouldn't it be better to state something like the following:

19-2

> The Federal lands have been unassessible to researchers due to most and/or the only access being via closed private property. It is expected that many of the sensitive plants on adjoining and nearby areas will be found on the Federal lands when a field survey is carried out.

Page 4-51, Table 4-16, Issue, Livestock Grazing, Alternative 4

19-3 There are cases of overgrazing in this area of Santa Clara County. The cattle have eaten the grass into the ground so there is little or no growth (bare soil) and the cattle have cropped the shrubs back to a few sticks and the tree branches cleaned back to the trunks and as high as the tallest cow or steer could reach. Virtually, all rainfall runs off the hard packed surface as soon as it hits.

Page 4-52, Table 4-16, Alternative 3, Maximize Production

19-4 "Fifteen-thousand visitor hours (10,000 ORV, 3,000 hunting and 2,000 hiking). Increased conflicts (trespass, vandalism) with adjacent landowners. Some erosion damage to vegetation and disturbance of wildlife would result from ORV activities". The EIS doesn't address the great potential erosion problem from ORV activities and the water quality degradation of the streams. The production of dirt, mud, silt and sedimentation could be devastating to the fish and aquatic life on the streams of the watershed. Further, the erosion products would seriously affect the water for the local water users and the water supply for the cities downstream that have need of good quality water for domestic purposes.

19-5 Regarding the recommended Alternative #2 of "Balanced Use", we certainly find it preferable to the "Present Management" alternative. However, we would recommend that Management Area 16 be surveyed for rare, threatened or endangered plants and wildlife during the Spring of 1984. The management program could then be specifically tailored for their preservation.

19-6 Finally, we recommend that an exchange of lands with private landowners, to provide a more consolidated BLM area managed in coordination with Coe Park, should be seriously considered as a management option.

Sincerely,

Hugh H. Graham
Environmental Assessment Coordinator

HHG:ad

cc: E. Jack Schoop, Director
Department of Planning & Development
Robert Sturdivant, Principal Planner
Eric Carruthers, Principal Planner
Arthur L. Ogilvie, Associate Planner

ad#18;holl/plg/alo

Response to Letter No. 19

19-1 At the outset of this planning effort extensive scoping, coordination and consistency meetings were conducted with agencies, local governments, interest groups and private individuals. These meetings were held to identify those issues that were of most concern and therefore should be specifically addressed in the Draft EIS.

Water quality was not identified through this process as a major issue in the South Bay Management Area (MA). As a consequence, no emphasis was placed on this issue in the MA for inventory purposes or impact analysis. It should be noted that the Draft EIS does propose standard mitigation measures to be adopted Planning Area-wide specifically for the water and soil resources for any surface disturbing action.

Table 3-14 is a summary of the water resources inventory conducted in 1982. For the above stated reasons, inventories were not completed for the South Bay Management Area.

Coyote Creek is the only stream on your list of areas of concern that contains public land in the watershed. The Preferred Alternative for lands adjacent to Henry Coe State Park (in the upper Coyote Creek watershed) calls for compatible management with the Park.

19-2 As previously mentioned, through the scoping and coordination process, Sensitive, Rare, Threatened or Endangered (RTE) species were not identified as a significant area of concern. For this reason no inventory was conducted.

For those areas lacking public access, administrative access for purposes such as inventories is usually obtainable.

19-3 There may be some instances of isolated over grazing in small areas. This occurs for a myriad of reasons - desirability of existing forage, proximity to water, etc., however, we are unaware of any conditions on public lands as you have described.

19-4 Vehicle use under all Alternatives is limited to designated routes. Areas considered for enhancement of ORV opportunities under Alternative 3 are virtually all in Stanislaus County. None of these areas physically drain into Santa Clara County. The Bureau remains committed to mitigation of adverse impacts associated with any surface disturbing action (see page 4-63, Draft EIS, Mitigation Measures).

19-5 The Bureau is committed by policy to evaluate all potential habitat prior to implementation of actions which may affect sensitive plant species. Site specific evaluations for RTE considerations will be completed for all surface disturbing actions prior to authorization.

19-6 This recommendation has been incorporated into the Preferred Alternative.

#20

United States Department of the Interior

NATIONAL PARK SERVICE
WESTERN REGION
[illegible] GOLDEN GATE AVENUE, BOX [illegible]
SAN FRANCISCO, CALIFORNIA 94102

7617 (WR-RPE)

November 30, 1983

Memorandum

To: Area Manager, Hollister Resource Area, Bakersfield District, Bureau of Land Management

From: ACTING Regional Director, Western Region

Subject: Proposed Resource Management Plan and Environmental Impact Statement for the Hollister Planning Area of Fresno, San Benito, Monterey, Madera, Merced, Stanislaus, Santa Clara, San Joaquin, Alameda, Contra Costa, San Mateo and Santa Cruz Counties, California

In accordance with your request, the Pinnacles National Monument staff has reviewed the subject documents. The following comments are restricted to issues and segments that directly or indirectly affect the social, physical and biological resource values inherent to Pinnacles National Monument. These comments are organized on an issue-by-issue basis.

LIVESTOCK GRAZING

20-1 The National Park Service strongly endorses the exclusion of livestock from the watershed area contiguous with Pinnacles National Monument (Alternatives 1 and 2) and the acknowledgement of the necessity of fencing along that perimeter. Pinnacles National Monument is in the process of fencing its effective perimeter (see our comments under Land Tenure) to exclude cattle and discourage immigration by exotic pigs.

20-2 Grazing pressure by domestic livestock adjacent the Monument should not be so heavy as to significantly alter wildlife population levels or distribution patterns in the area. For this reason, we oppose Alternative 3. Further information is required to determine the range in combinations of livestock grazing pressure and land improvement techniques and regimes that would afford minimal protection to wildlife populations in the Monument. In this regard, we recommend a cooperative effort involving the National Park Service, California Department of Fish and Game, and the Bureau of Land Management.

OIL, GAS AND MINERALS

We strongly support the withdrawal of the area south of the La Gloria Road from Mineral entry (Alternatives 1 and 4) and the application of strict environmental constraints (no new road construction, rehabilitation of activity sites, etc.) to exploration and development in areas within view of the Monument.

FIRE MANAGEMENT

20-3 We concur with the inclusion of all parcels of land adjacent to Pinnacles National Monument into a Joint Fire Management Plan (Alternatives 1 and 2). Ideally, this joint planning effort would include the California Division of Forestry and private landowners as well as the BLM and NPS. Prescribed burns, unplanned man caused fires, and/or natural fires may be permitted to burn under predetermined prescriptions in order to promote natural conditions (Alternative 1) and/or for the purpose of fuel hazard reduction (Alternatives 2 and 4) subject to criteria that would be established in the development of the Joint Fire Management Plan. We do not agree that spring burns be categorically banned (Alternative 1). Although spring burns are rare, they may occur under natural conditions, and as such, could be permitted. Spring burns also may be useful in fire break construction and for fuel reduction in sensitive areas. The National Park Service supports a posture of minimal mechanical preparation of land or vegetation within and adjacent to the Monument either in the act of fire suppression or as support for prescribed burning. We recommend that the

20-4 Superintendent of Pinnacles National Monument determine whether new or existing dozer lines or any other mechanical manipulation would be used for any fire management purpose on lands within the 2200 acre watershed and within additional areas brought under cooperative agreement.

RECREATION

We concur that vehicle use should be limited to designated routes (Alternatives 1,2, and 3). No vehicular access should be permitted on land within the 2200 acre watershed area nor in additions brought under cooperative agreement. The National Park Service cannot support the proposal to provide general access through the Monument for the purpose of hunting on adjacent public lands for the following reasons:

1. No regularly maintained National Park Service trail reaches any parcel of adjacent public land. The NPS would find it a necessity to limit hunting access through Pinnacles National Monument if and when granted, to specific and defined routes (trails or roads). These do not exist at this time. Pinnacles National Monument has identified many projects for which additional funds have been

20-5 requested and the priority of which would remain higher than that for providing a trail system for hunter access.

2. The NPS would find it necessary to provide the opportunity for the hunters to bring their animals out. Distances and terrain dictate that foot access would be inadequate for this purpose. Stock trails would need to be maintained with their increased standards, maintenance requirements, and costs. The construction of trails of such scale and standard is in conflict with management objectives in several Monument areas adjacent BLM lands.

3. At current staffing levels, Pinnacles National Monument cannot effectively patrol park boundaries and potential hunting access routes on a year round basis.

4. Monument boundaries adjacent to other public lands are indistinct, midslope, section lines. It is very difficult for the hunters to know whether they are on private land or public lands.

5. Pinnacles National Monument has an acute parking problem on weekends throughout the spring and fall months. The addition of hunters to this already acute
20-5 Cont. situation only intensifies the problem.

6. No information is available on the potential effect of increase hunting pressure on wildlife populations within the Monument.

7. The NPS has traditionally provided opportunity for park visitors to experience nature on its own terms. The interjection of hunters into this environment would be in clear conflict with this use pattern.

The National Park Service opposition to this proposal is not a categorical unwillingness to reconsider future requests on a case-by-case basis. A case in point may exist. A primitive dirt road extends across the Bench area to a point near the BLM boundary. The National Park Service might consider granting limited access in this area subject to review as park planning documents are updated.

The National Park Service strongly supports efforts to acquire easements across private lands to secure hunter access to the public lands in question. These routes, generally much shorter than access routes through the park, would be more convenient for the hunter and less costly to the government than the fiscal commitment necessary for trail construction and long-term maintenance and patrol.

LAND TENURE

We concur that the entire lot of BLM land be retained in public ownership. A cooperative management agreement concerning the 2200 acre watershed area is essential for the effective and efficient protection of Monument values. The topographically defined boundaries interent to the 2200 acre watershed area are essential for the exclusion of cattle and deterrence of feral pigs from entry into the Monument, efficient implementation of the Monument's fire management plan, and preservation of the integrity of the Monument's internal viewshed. In addition to cooperative management of the 2200 acre watershed area, the NPS supports the inclusion of two other units of land into the area covered by the cooperative agreement. The first is an area of approximately 300 contiguous acres near Grassy Canyon (T17S, R8E, Section 6). The primary reason for this
20-6 adjustment is the effective location of a fence to exclude cattle and deter pigs from entering prime valley oak habitat along Chalone Creek. The second is a yet to be determined adjustment along the south boundary of the Monument. In this case, the NPS is opting for a less topographically rigorous, lower slope position for establishing a fence in lieu of the rugged midslope location presented by the legal boundary. The potential ridgeline location at the head of this watershed crosses South Chalone Peak and would intrude significantly upon

20-6 Cont. the integrity of now classified wilderness. The lower slope position lends itself to a more efficient and less costly fence location, complements the fire management program, preserves the visual integrity of the Monument's internal viewshed, and may be an aid to cattle ranchers outside the Monument.

VISUAL RESOURCES

The National Park Service strongly supports the position that no road construction, oil and gas development or use of dozer lines occur within the 2200 acre watershed area (Alternative 2). We also encourage the minimum use of dozer lines, road construction, and oil and gas exploration and development on public land in the external viewshed of the Monument. Rehabilitation of disturbed sites in the external viewshed should also be required and the Superintendent of Pinnacles National Monument will work closely with BLM to facilitate these mitigations. Also, the Monument is a Class I airshed. Any activity that threatens this status should not occur.

As noted in the first paragraph of this memorandum, the foregoing comments apply only to potential impacts on and interests of the Pinnacles National Monument. Since neither this office nor our Washington Office received copies of the documents for review, we are not able to provide comments on other potential interest areas of NPS--particularly those relating to cultural resources. Normally other agency review documents are routed through both the Department's Office of Environmental Project Review and our Washington Environmental Compliance Division so that all interested parties receive copies of the documents, comment deadlines coordinated and control numbers assigned. Therefore, we request that the Hollister Planning Area documents be provided to both this office and the above-named offices and that we be provided additional review time to ensure that all of our potential interests are addressed. The provision of any attendant cultural resource documents (to our office only) would be helpful in our review.

cc:
State Director, Bureau of Land Management, Sacramento
Regional Environmental Officer, San Francisco
Superintendent, Pinnacles

Response to Letter No. 20

20-1 The Preferred Alternative considers fencing of the watershed boundary to exclude livestock from that area. A wire mesh fence, of the type necessary to discourage immigration by exotic pigs, would alter wildlife distribution patterns by affecting deer movement, possibly resulting in an undetermined amount of fawn mortality. The Bureau seriously doubts the need for such a fence and does not support its construction on BLM-administered public lands surrounding the Monument. While we can endorse a fence to exclude livestock, it would have to be totally funded and maintained by the National Park Service under the cooperative agreement.

20-2 Grazing levels under the Preferred Alternative (with exclusion in watershed areas) would adequately provide for wildlife needs in and adjacent to the Monument. The concern expressed for wildlife here appears to be at odds with the type of fencing proposed for the effective Monument perimeter.

20-3 We concur that the California Department of Forestry and adjacent private landowners should be involved in a Joint Fire Management Plan. We would also suggest that the National Park Service (NPS) assume the lead responsibility in developing such a plan.

20-4 Future fire management actions on lands adjacent to the Monument would be mutually determined as a part of the Fire Management Plan and cooperative agreement.

20-5 Although the National Park Service cannot presently support the provision of general access through the Monument for hunting on adjacent public lands, the Bureau will continue to work with the Park Service for the possible future implementation of the proposal for the following reasons: The majority of hunters willing to pursue game on foot do not require an established trail system or the use of stock. There are currently accessible areas on BLM-administered public land that require the serious sportsmen to walk 4-5 miles from an access point. Controlled hunting access could be provided via a lottery system which would allow a small number of individuals access to a specific area or areas. The exact areas and number of hunters would depend on a mutual agreement by all parties concerned (NPS, private landowners, CDFG, CDF and BLM). Posting such an area or areas would be the responsibility of BLM. Such a lottery could be limited to a few weekends or week days during dear season. This would greatly limit the potential for conflicts with park visitors and creation of parking problems as the hunt would occur during the low point in visitor use at the Monument. The California Department of Fish and Game considers this a viable proposal and has indicated their willingness to assist in the administration of such a lottery. Although the lottery would allow only a few individuals the unique opportunity of a specialized hunting experience, thousands of potential hunters state-wide would have the opportunity to apply.

In the interim, a cooperative agreement should be reached to enhance hiking opportunities in those areas. These lands already have legal public access through the Monument and have considerable potential for recreation use in conjunction with Monument lands. Also see the response to Comment 18-1.

20-6 The Bureau does not support the total inclusion of the area near Grassy Canyon in the cooperative agreement area until a mutual on-the-ground assessment can be made. When a boundary that satisfies the mutual management goals of both agencies can be determined, the Bureau will support fencing such a boundary to exclude livestock. We are also willing to consider proposals for the area along the south boundary, however, we strongly doubt the need for a fence in this location to exclude either livestock or feral pigs due to the extremely steep and rugged terrain which forms a natural barrier. In both cases, the Grassy Canyon and south boundary areas are currently under grazing lease. Each lessee has recently cooperated with the Bureau and Department of Forestry on prescribed burns to improve forage conditions in these areas. It would be necessary to consider these facts in any proposal to eliminate further areas from grazing lease. The previously delineated watershed area and possibly all or a portion of the area near Grassy Canyon would be logical to include within a fenced cooperative agreement area. Livestock use in these areas is either impractical or difficult to manage and conflicts with Monument management are well documented. This is not necessarily the case on the south end.

#21

MONTEREY COUNTY

PLANNING DEPARTMENT

(408) 422 9018 P. O. BOX 1208 · SALINAS, CALIFORNIA 93901

ROBERT SLIMMON, JR.
DIRECTOR OF PLANNING

December 9, 1983

David E. Howell
Hollister Resource Area Manager
Bureau of Land Management
P.O. Box 365
Hollister, CA 95023

Dear Sir:

Thank you for the opportunity to comment on the Draft Hollister Planning Area Resource Management Plan and EIS.

21-1 Considering the large area described, the EIS is adequate to determine a management strategy. However the EIS also describes a lack of firm knowledge about the plant, animal and cultural resources that exist on various segments of BLM land. The situation is understandable since much of the land is inaccessible or has not attracted the interest of scholars who are able to document and record natural resources. Appendix 2, #3, page A2-3 states that there are no designated areas of critical enveronmental concern (ACECs) in the planning area. It should be clearly stated that BLM can and will designate and support such areas and monitor in-flowing data to identify them as future discoveries and research become available.

Policy discussions regarding proposed uses of BLM land seem accurate insofar as they address consistency with the Monterey County General Plan. Passive uses such as hiking, bird-watching hunting or fishing fall within the range of intended uses designated in Monterey County General Plan since all BLM lands fall within the "Permanent Grazing" or "Resource Conservation" designations.

Sincerely,

Raymond W. Lamb
Assistant Planning Director

RWL:LHM:cm

Response to Letter No. 21

21-1 Inventories of public lands have been limited mainly by funding or lack of a recognized need for inventory rather than a lack of access or interest from the scientific community (also see the response to Comment 19-1). The Preferred Alternative proposed three ACECs in Fresno and San Benito counties. Future designations would be possible wherever justified on the basis of new information.

#22

FOR BLM MANAGEMENT

Sir:

I favor ALT PLAN #2 for area #8

#3 for area 3

#3 for area 4

Thank you

W. B. Wamsutt

#23

[illegible]

#24

I have looked at the alternatives in your study and would like to see the following in effect

Alternative #2 for Clearcreek

" #3 for Sierra De Salinas

" #3 for Pinnacles

Frank Rodgers
150 Kern St. SP38
Salinas, CA 93901

#25

I favor Alt. Plans #2 for #8

#3 for #3

#3 for #4

For the BLM MAN Agent.

Thank you.

Bob Day & Family

Bob Day
40 Clarinda Ave
Salinas Ca.

#26

After reviewing the various alternatives for the various areas under your jurisdiction, I would prefer to see the following alternatives be effective in the following areas.

Alternative Area
#2 for 8-Clear Creek
#3 for 3-Sierra de Salinas
#3 for 4-Pinnacles

ED TOBIN
490 Ferris
MARINA, CA
93933
408-384-4455

#27

Sir: after extensive study of the New proposed land management alternatives. We have decided to favor alternative #2 for management area #8
and #3 for " " #3
and #3 for " " #4

Eugene Pescatore
115 So. Mesa Dr.
Salinas Ca 93905

#28

I have looked at the alternative [illegible] areas under [illegible] consideration. I would [illegible] the [illegible] alternatives
#2 for 8 Clear Creek
#3 for 3 [illegible] de Salinas
#3 for 4 Pinnacles

Ed Parker
[illegible] Pinnacles Dr
Salinas Ca
93906

#29

I favor
Alt #8 Clear Creek
#3 Sierra de Salinas
#4 Pinnacles

Alternative	Given
#2 for	#8
#3 "	#3
#3 "	#4

Salinas Pagan
136 Sarsena
Salinas Calif
93906

#30

We favor the following alternatives in the management areas under consideration:

2 for Area #8

3 for Area #3

3 for Area #4

Gerald Dent
and family

#31

Dear Sir

In regard to the Salinas Resource planning area I favor

I favor plan No. 2 for area 8
I favor plan No. 3 for area 3
I favor plan No. 3 for area 4

Thank you

Charles M. Perry
906 E. Market St
Salinas, Ca. 93905

#32

I favor Alternative # 2 for Management Area # 8 Clear Creek

Thank you.

Dorothea L. Recsetine
118 La Mesa Dr
Salinas, Ca 93701

#33

I favor Alternative Area

2 in Area 8
3 " " 3
3 " " 4

Arthur Rodgers
130 Gardenia Dr.
Salinas Calif. 93906

#34

Dear Mr Howell

I am in favor of area management plan #2 in area #8

#3 in area #3

#3 in area #4.

At this time I believe these plans are best for these areas.

Robert L Schreiber

#35

After reviewing the Information of your recent Open House I am in favor Alternative #2 for area # 8, # 3 for area #3, and #3 for area #4. As a member of the Salinas Ramblers Motorcycle Club supports the Same Alternatives

Don Baker
134 Piloma
Salinas Ca
93905

#36

I favor Alternative # 3 for area #3

I also favor alternative # 2 for Area # 8

Tom "Lefty" Miyanaga

#37

I favor alternative # 3 for area # 3

I also favor alternative # 2 for area # 8

Willard Akers

#38

David E. Howell
Hollister Resource Area Manager
BLM

Dear Sir:
As recreational users of BLM land, we wish to express a preference of management plans for areas #8 Clear creek; #3 Sierra de Salinas and #4 pinnacles. We prefer plan #2 for area 8, & plan 3 for areas 3 & 4

Thank you,
Kerry McKenzie & Family

#39

I have looked at the alternatives in your draft and I favor

Alternative # 2 for Area 8
" # 3 for Area 3

Claire J [illegible]
126 Rocky
Salinas CA
93906

#40

I FAVOR Alternative ~~Plan~~ in land Management.

alternative #
2 for area 8 Clear Creek
3 for area 3 Sierra de Salinas
3 for area 4 Pinnacles

[illegible]
1467 [illegible]
Salinas CA 93906

SRMC

#41

I favor Alternative #4 for area #8 (Clear Creek) alternative #3 for area #3 (Sierra de Salinas) alternative #3 for area #4 (Pinnacles) Thank you for the opportunity to hear you explain all this at your open meeting.

Sandra Oaton

#42

as a tax paying voting citizen of California, who enjoys off-road recreation. I favor and will ~~ent~~ endorse alternative # 2 for area 8

3 for area 3

3 for area 4

Please feel free to contact me on any correspondence in ~~re~~ reference to area management.

Ron Dethlefsen phone # 722 7312

#43

I FAVOR ALTERNATIVE # 2 IN MANAGEMENT AREA # 8.

ALSO IN AREA # 3 ALTERNATIVE # 3

AND IN AREA # 4 ALTERNATIVE # 3

THANK YOU

ROY C HAPPELL

1629 LAGUNA SEASIDE CA

#44

Hi I would like to have more use-able ORV acres mainly in the Salinas area. But would like ~~more~~ ~~and~~ additional motorcycle rideing in the Clear Creek & Pinnecles area. With out being charged admission. Possibly regrade some main trails & roads in case of accidents.

Giving more trails in the Salinas area might help keep trespassers off of ~~Privet~~ Private prop. Thank You. Tim Wood

Response to Comments No. 22 - 44

Thank you for your comments. They have been considered in the development of the RMP.

#65

GEORGE L. MATTHEWS
LAURA ANN MATTHEWS
5961 BLUE RIDGE
MONTCLAIR, CA
91763

DEC 1983
RECEIVED
U.S. BUREAU OF LAND MANAGEMENT
HOLLISTER, CALIF.

BLM -

12-12-83

DEAR SIR,

45-1 WE FREQUENTLY USE THE CHAPAL CREEK RECREATIONAL AREA TO VISIT FRIENDS. THIS AREA SO RICH IN HISTORY & OPEN SPACES SHOULD BE KEPT OPEN FOR ALL. THERE ARE PRIVATE & PUBLIC AREAS OPEN FOR THIS PURPOSE, WHY NOW THIS AREA NEEDS TO BE OPEN.

45-2 THE ROADS NEED TO BE IMPROVED TO MAKE THIS AREA MORE ACCESSIBLE TO RV'S. PERHAPS THERE COULD BE SOME AREAS CLEARED FOR CAMPING SO PEOPLE CAN COME IN FROM NEW TOWN AREAS.

WHEN WE WERE THERE LAST MEMORIAL DAY WEEKEND THE ROAD BY LISA DUNCAN'S GROW HILL WAS WASHED OUT SO BADLY THAT WE COULDN'T PULL OUR SMALL TRAILER THERE. WE HOPE

45-3 THIS HAS BEEN REPAIRED. SOME ARRANGEMENTS COULD BE MADE WITH THE RANCHERS FOR ONLY CAMPING ON THEIR LAND BEFORE THE ENTRANCE TO CHAPAL CREEK AREA.

45-4 BY-THE-WAY WE NOTICED THE SIGN HAS BEEN MOVED FARTHER UP THE HILL. WONDER WHY.

WE URGE YOU TO KEEP CHAPAL CREEK RECREATIONAL AREA OPEN FOR RECREATION ONLY.

SINCERELY,

GEORGE L. MATTHEWS

LAURA ANN MATTHEWS

Response to Letter No. 45

45-1 The Clear Creek Area would remain open to public use under all alternatives.

45-2 The Bureau recently acquired funds through a grant from the State of California to improve the public land portion of the Clear Creek Road.

45-3 The Preferred Alternative recommends acquisition of private lands at the entrance to Clear Creek through purchase or exchange.

45-4 The sign was previously located on private land. The new location is within the public land boundary.

#46

6135 Cowlinga Road
Paicines, Calif. 95043
December 12, 1983

Mr. David E. Howell
Hollister Resource Area Mgr.
Bureau of Land Management
P.O. Box 305
Hollister, Calif. 95023

Dear Mr. Howell:

46-1 We protest any further expansion, or opening up, of any additional public land in south San Benito County for motorcycle and O.R.V. use. We feel that the best use of the public land would be to return it to all the people; and eliminate, rather than increase, use by exclusive groups who are tearing up and destroying the once beautiful Clear Creek area. In addition to this destruction, we suffer greatly from invasion into our area by these motorcyclists.

46-2 We would like to inform you of a few problems caused by these people. They cut down our trees (for firewood), litter our land with cans, broken bottles, disposable diapers, garbage, and waste from their chemical toilets, etc.. They ride their bikes over private land, causing erosion problems, chase the cattle and shoot and steal signs. Attracting more O.R.V.'s to the area, as proposed by the Bureau of Land Management, will greatly increase these problems. Most of these people come from other counties in self contained vehicles and do not benefit San Benito County.

46-3 We know that the B.L.M. is aware of erosion caused by motorcycles, leading to excessive siltation of Hernandez Reservoir and the San Benito River. Has any thought been given to the pollution of the river below Hernandez Dam, all the way to the Pacific Ocean, from asbestos, cans and litter going over the spillway? We understand the belief that there is little danger to humans from asbestos suspended in water, but we are greatly concerned about that which is deposited along the banks of the river and lake when the water level drops. In dry weather, this creates excessive asbestos dust for those living and working along the river. We strongly object to creating further access to the lake because of this problem.

Finally, we object to the B.L.M. plan to increase any recreational use of public lands until B.L.M. can effectivly supervise to protect neighboring private landowners from damage caused by these activities.

Sincerely,

Welling T. Gates
Alice B. Gates

cc: Mr. Clark, Dept of the Interior
Robert D. Baeirer, Jr., District Mgr.
Rocky Lydon, Supervisor, San Benito County

Responses to Letter No. 46

46-1 Not all users of the Clear Creek Area are motorcyclists. The area is also popular with other groups such as hunters and rockhounds. ORV use has actually declined 25 percent from 1977 to 1982. Many responsible groups and individuals have been assisting the Bureau for a number of years in annual clean ups of the area. It should also be noted that public land users spend money on goods and services within the county. A 1977 survey conducted by the Bureau indicated that 100,000 dollars were spent annually by public land recreationists in San Benito County. (Also see the response to Comment 18-3).

46-2 Prior to the construction of Hernandez Reservoir and ORV use in Clear Creek, natural erosion probably carried large amounts of asbestos downstream. Although ORV use may accelerate natural erosion rates, since construction of the dam and reservoir there is probably less asbestos being carried downstream. (Also see the response to Comments 1-2, 8-4 and 8-5).

46-3 See the response to Comment 9-1.

#47

FRESNO, CA
DEC 11, 1983.

U.S. DEPT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

GENTLEMEN:

47-1 UNABLE TO ATTEND ANY OF THE INFORMAL MEETINGS REGARDING HOLLISTER RESOURCE MANAGEMENT PLAN BECAUSE OF LACK OF KNOWLEDGE OF THE MEETINGS BEING HELD, I SUBMIT MY COMMENTS ON THE FOUR ALTERNATIVES.

I THINK ALTERNATE II WOULD BE THE MOST APPROPRIATE PLAN FOR ALL INTERESTED PARTIES CONCERNED.

MY INTEREST IN THE AREA IS PRIMARILY CHUKAR & QUAIL HUNTING - BUT COULD INCLUDE WILD PIG & TURKEY IF THEY INCREASE IN NUMBERS. HAVING HUNTED IN PAST YEARS IN THE TUMEY-GRISWOLD HILLS AREA, I WAS DISAPPOINTED TO

47-2 SEE THE AREA CLOSED BY LANDOWNERS AND HOPE SOME ACCESS AGREEMENTS CAN BE ARRANGED TO BLM LANDS CONSEQUENTLY CLOSED BY THE ACTION OF LANDOWNERS.

THE AREA IS QUITE EXTENSIVE, & I WOULD HOPE ANY OPENING OF THE AREA WOULD ALLOW SOME CONTROLLED VEHICLE ACCESS AS PARKING ON THE PERIMETER AND WALKING IN SEVERAL MILES AND THEN ATTEMPTING TO HUNT THE ELUSIVE AND HARD-RUNNING CHUKAR PARTRIDGE AT MY AGE WOULD PRECLUDE MY HUNTING THERE. THE COUNTRY IS STEEP, ROCKY & VERY RUGGED AS I AM SURE YOU ARE AWARE. I MANAGED TO HUNT THE AREA WITH MY SONS YEARS AGO BY USING EXISTING HIGH PRESSURE GAS LINE ROADS IN THE AREA TO GET TO THE RIDGES TO HUNT DOWN ON THE BIRDS. OTHER PARTIES USED THE AREA AS WE DID - IN JEEPS - BUT NOT MANY HUNTED THERE DUE TO THE RUGGED TERRAIN, THEREFORE THE SOIL DAMAGE WAS MINIMAL UNTIL THE OFF-ROAD MOTORCYCLE CLUBS FROM SAN JOSE, SO. CALIF, ETC. DISCOVERED THE AREA.

WHERE THE HUNTERS CONFINED THEIR USE OF VEHICLES TO TWO OR THREE ROADS, THE TRAIL-BIKERS CARVED UP EVERY SLOPE, RIDGE, ETC. THEY FOUND - OF WHICH THERE ARE MANY.

I HAVE NO WISH TO PREVENT MOTORCYCLISTS FROM ENJOYING THEIR CHOSEN RECREATION ANY MORE THAN I WOULD LIKE HAVING MY HUNTING PRIVILEGES DENIED, BUT THE TWO FORMS OF ENJOYMENT DO NOT MIX.

47-3 THE BIRDS WOULD SOON VACATE THE AREA TO A GREAT DEGREE SIMPLY BECAUSE THE MOTORCYCLES ARE NOISY AND CONGREGATE IN VERY LARGE NUMBERS. IT WOULD SEEM MORE LOGICAL TO ME TO DESIGNATE AREAS FOR THE TWO FORMS OF RECREATION THAT ARE SEGREGATED - ONE FROM THE OTHER - TO AVOID ANY CONFLICTS OF INTEREST. I BECAME AWARE OF THE PROPOSED MANAGEMENT PLANS THRU A CHANCE MEETING WITH DAVID LEHMANN OF YOUR HOLLISTER OFFICE WHILE VISITING THE SAN BENITO MT. NATURAL AREA RECently.

HE KINDLY SENT ME THE PROPOSALS AND SUGGESTED I MAKE MY COMMENTS TO YOUR OFFICE BY LETTER.

WITH THE STEADILY INCREASING POPULATION (AND HUNTERS + OTHER RECREATIONS) THE ABILITY TO USE FEDERAL OR OTHER PUBLIC LANDS IS BECOMING INCREASINGLY IMPORTANT AND I FOR ONE AM HAPPY TO FINALLY SEE A MORE "VISIBLE" BLM FIELD FORCE AND A DEPARTMENT THAT IS APPARENTLY BECOMING MORE AWARE OF THE NEED OF THE PUBLIC TO FIND AND USE PUBLIC LANDS. I THINK YOU WILL FIND THE AVERAGE - CONSCIENTIOUS RECREATIONIST WILL BACK YOU AND WORK WITH YOU.

SINCERELY

Lawrence M. Skinner
4774 E HARVARD AVE
FRESNO, CA 93703

Response to Letter No. 47

47-1 The Bureau attempted to get the word out on the public meetings through a series of letters, Federal Register Notices and news releases to newspapers, radio and T.V. stations in the area.

47-2 The Preferred Alternative recommends land exchange and easement acquisition in the Tumey Hills and other areas to improve recreation access.

47-3 The Preferred Alternative restricts or prohibits motorcycle use in areas more suitable for hunting such as the Condon Peak Area and the Panoche/Griswold-Tumey Hills Area (respectively). Portions of the Clear Creek Area that are less suitable for hunting are open to motorcycle use.

#48

903 Monterey Street
Hollister, Calif. 95023
December 15, 1983

Bureau of Land Management
Hollister Resource Area Office
Park & San Benito Street
Hollister, Calif. 95023

Mr. Dave Howell, Area Manager
Mr. Dave Lehmann
Mr. Scott Florence

Dear Sirs:

48-1 I own approximately 240 acres that border on the Pinnacles National Monument, Pinnacles Land & Cattle Co. and BLM land. I strongly oppose the opening of this BLM land for hunting or "primitive camping" to the public. Boundaries are not defined, and posting certainly will not stop hunters from trespassing or shooting on private property. Unless this land is patrolled constantly, and I assume cost would prohibit this, no-one can tell me that a hunter seeing deer or any other animal on private or park property wouldn't shoot, including mountain lion and bobcats. I do not allow hunting on my property, and I want to keep it that way. Furthermore, the approximately 1,000 acre parcel, in my opinion, is not large enough to open it as a public hunting area. Mankind is doing a great job slaughtering animals as it is, without any further help from BLM.

48-2 South County is a very hazardous fire area, and campfires should not be allowed outside of supervised areas. It would take only one careless "civilian", and we would have an inferno resulting in loss of land, property, animal and bird life. This we do not need. I do not condone "primitive camping", and any devastation that would result from it.

48-3 I feel that the Bureau of Land Management should not open this land for any reason. It's time that the rights of land-owners and their wishes be respected. For the record, I'm in agreement with the Board of Supervisors, that until BLM can guarantee total safety in ALL areas for property owners, I am opposed to this proposal. It will bring nothing but trouble and bad feelings.

Thank you.

Shirlei Francis
903 Monterey Street
Hollister, CA. 95023

Response to Letter No. 48

48-1 See the response to Comment 18-1.

48-2 See the response to Comment 18-2.

48-3 See the response to Comment 9-1.

Judy Owyang
FOSSILS / ETC.

#49

December 14, 1983

David E. Howell
Hollister Resource Area Manager
Bureau of Land Management
P.O. Box 365
Hollister, CA 95023

RE: Proposed Management Plan for the Hollister Planning Area - 1983

Dear Mr. Howell:

49-1 As I have briefly studied a copy of your above mentioned proposed management plan, I find that your proposed Paleontological sections of the plan to be inadequate.

In the case that I wish to go to court, the report is not only inadequate, but the entire plan is not specific as it does not deal with social and economic ramifications as required in the National Environmental Policy Act.

49-2 With regard to Paleontological section, details are not provided as to what is allowed or not allowed. There is no development of a plan as to restricting field collection of fossils.

As all of your recommendations are so general, it is evident that this is no plan at all.

Sincerely,

JUDY OWYANG

1914 Sawtelle Boulevard • West Los Angeles, California 90025 • (213) 477-3166

Response to Letter No. 49

49-1 See the response to Comment 15-1.

49-2 The RMP provides the basic guidance for the development of an ACEC Management Plan which will detail special management requirements for the Moreno Paleontological Area. The plan will outline the conditions for permitting and restricting the collection of fossil resources. Collection for casual or commercial purposes is prohibited in order to protect significant scientific and educational values.

#50

County of FRESNO

Parks Division

December 16, 1983

David E. Howell, Area Manager
Bureau of Land Management
P.O. Box 365
Hollister, CA 95023

RE: Hollister Planning Area - Draft EIS

Dear Mr. Howell:

Staff has reviewed the July 1983 Draft Hollister Planning Area Resource Management Plan and Environmental Impact Statement. We agree with the Plan and have the following comments:

50-1
1. Request access into the subject area(s) by users of off-road vehicles, and
2. Request access for recreation users who hunt, hike, sight-see, rock-hunt and photograph.

We thank you for the opportunity to comment on this proposed project.

Sincerely,

Ken Takeuchi
Parks Administrative Coordinator

KT:jb

2220 Tulare Street 8th Floor Fresno California 93721 (209) 488 3004
Equal Employment Opportunity — Affirmative Action — Handicap Employer

Response to Letter No. 50

50-1 Thank you for your comments.

#51

United States Department of the Interior

FISH AND WILDLIFE SERVICE
SACRAMENTO ENDANGERED SPECIES OFFICE
1230 "N" Street, 14th Floor
Sacramento, California 95814

DEC 20 1983

David E. Howell
Area Manager
Bureau of Land Management
P.O. Box 365
Hollister, California 95023

Subject: Draft Environmental Impact Statement, Proposed Resource Management Plan (RMP) for Hollister Planning Area (1-1-83-I-634) BLM CA ES 830141792

Dear Mr. Howell:

We have reviewed the subject document and believe it represents a tremendous amount of hard staff work to lay a solid ground for public land management in the Hollister Area. The document is necessarily general and we have few specific comments, however, in our view, the RMP points BLM in the direction of land management that is more aware of the broad range of legitimate resource issues and conflicts. We are particularly pleased to see that endangered species have been elevated to Issue status equivalent to grazing, oil/gas, and recreation. We believe this is consistent with your mandates for public land management and, more importantly, will help to resolve endangered species-land use conflicts in the future.

51-1 From the broader focus of the RMP, we hope that Habitat Management Plans (HMP) will be prepared for each of the Management Areas (MA). The HMP can be more specific and analytical regarding implemention of the RMP guidelines in the selected alternative (Alternative #2-Balanced Alternative). We are particularly interested in seeing HMPs prepared for those MAs supporting endangered species and candidate species--Panoche Hills, Griswold-Tumey Hills, Ciervo Hills, Coalinga, and Clear Creek, Squaw Leap and C. San Joaquin (East). (A Management Plan for the first three was reviewed in 1982.) Individual HMPs should address all feasible measures, including ACEC designations, where benefits to RTE species can be achieved.

Grazing

In general, an adjustment in livestock AUMs should benefit some endangered and candidate species. Livestock grazing and blunt-nosed leopard lizard/San Joaquin kit fox utilization of range are probably compatible at some level although no definitive studies have been conducted. Beyond that qualitative statement, we are unable to relate
51-2 specific AUM changes to a specific magnitude of wildlife benefits. The RMP could describe what benefits to wildlife an adjustment from say 102 AUM to 66 AUM would create. There may or may not be a direct relationship between reduced livestock use and increased wildlife use.

51-3 Likewise we are unable to evaluate the wildlife value of a 700 pounds/acre residual forage. Is such a level adequate for wildlife in the Hollister Planning Area? What would be the effects on wildlife and local economics of a residual level of say 1,400 pounds/acre? 350 pounds/acre? What is the relationship between a given AUM allotment and maintenance of 700 pounds/acre residual? The RMP could be revised to address these and other questions to assist readers who are not familar with livestock grazing aspects of land management.

We support the concept (p. 2-4) of periodic monitoring of grazing levels, (as well as other land uses) to develop stipulations for levels of surface disturbance that would be compatible with wildlife, particularly RTE. We realize this is easier said than done.

Oil/Gas/Mineral Leasing

Like grazing, oil/gas/mineral leasing and development is probably compatible with RTE at some level. We have worked more closely with BLM personnel on this issue and the level of compatibility is better understood. However, we believe significant benefits to RTE species conservation can derive from consideration of a policy to withdraw from leasing those lands recognized as RTE habitats when existing leases
51-4 expire, and when little or no interest has been shown in development or where exploratory drilling has indicated little likelihood of producable reserves. This need not conflict with your mandate to encourage domestic energy development if lands so withdrawn have already been offered for production.

51-5 It is unfortunate that unauthorized oil/gas activities have adversely affected RTE species in the Panoche Hills MA (p. 3-48). What management actions are needed to stop such activities? The RMP could be revised for Panoche MA to include management actions needed to stop and correct these Federal land law violations.

51-6 Panoche Hills habitat for the San Joaquin kit fox that has been adversely affected by past mining and ORV abuse could be the site for habitat restoration measures such as revegetation or artificial den structures. ORV closures in Panoche and Griswold-Tumey Hills MAs should be considered to halt and reverse adverse impacts. The RMP would be improved by inclusion and analysis of these concepts at appropriate places in the document.

Recreation

51-7 The Goal outlined for this Issue (p. 1-3) seems to indicate a lower level of protection (i.e., "minimize resource damage") for, say, the proposed (Camissonia benitensis) or candidate plants than is expressed in the Goals under the Livestock Grazing and Oil/gas Issues. A Goal in the latter two Issues to "protect" the habitat of RTE species contrasts with the Recreation Goal to minimize resource damage. Is this distinction necessary? Is it a prognostication of damage or recognition that proposed or candidate species cannot be fully protected from ORV damage or other recreational pursuits? If so, the result could be a conflict with the Goals of the RTE Issue.

We wholeheartedly commend the monitoring effort regarding the proposed and candidate species. Given the potential for ORV and related impacts, this information will be needed continuously or at least on an annual basis. We support the continuation of the mineral segregation along Clear Creek and in the San Benito Natural Area. If not for this action, hard rock mining along Clear Creek would pose a serious threat to the proposed endangered plant, Camissonia benitensis.

51-8 Finally, we tentatively support the acquisition of private lands near the entrance of Clear Creek Canyon to provide for camping and staging areas. If this would mean a net increase in camping sites or ORV activity in Clear Creek Canyon, we would not encourage this acquisition as it could eventually lead to greater ORV threats to Camissonia benitensis.

Specific Comments

51-9 P. 1-4. The Goal for RTE species should be to "recover" rather than to merely "sustain" such species. This would eliminate the implication that only such protection and habitat improvement required to keep populations at existing levels will be implemented.

51-10 P. 2-2. What is the purpose of the 30,000 acre ACEC in Clear Creek Canyon if it will not affect any changes in the existing ORV designations? Is it needed to continue the monitoring program or the watershed enhancement measures?

51-11 P. 2-31. Why was the mining restriction eliminated on 79 acres along the San Benito River?

51-12 P. 3-17. Candidate species from our December 15, 1980 Notice of Review (45 FR 82480) do not enjoy protection of the Endangered Species Act. We attempt to highlight candidate species as a means of alerting Federal agencies and the public to possible future conflicts. The RMP could, however, describe BLM policy regarding candidate species.

51-13 P. 3-22. Regarding your list of "sensitive" or candidate species (Table 3-12), Orthocarpus campestris var. succulentus should be added to the Squaw Leap Management Unit. Benitoa occidentalis and Raillardella muirrii are no longer candidate species.

51-14 P. 3-62. There is no officially designated Critical Habitat for the blunt-nosed leopard lizard. The reference here may be to lands designated in the Recovery Plan as important habitat for the species.

Finally, despite the fact that ORV groups have provided the most active input to the RMP process, we encourage you to continue to seek the involvement of other user groups and the public at large. You may have to work hard to convince the public of the importance of their involvement, but that, too, is a part of land management in our view.

Thank you for the opportunity to comment. If you wish to discuss these comments please call Ralph Swanson at FTS 448-2791.

Sincerely yours,

Gail C. Kobetich
Project Leader

cc:
Regional Office, Portland, OR (AFA-SE)
Bureau of Land Management, 2800 Cottage Way, Sacramento, CA 95825

Response to Letter No. 51

51-1 There are existing HMPs in the Squaw Leap and Panoche, Griswold-Tumey, Ciervo Hills MAs. Proposed HMPs would be developed for the Clear Creek, Williams Hill and Sierra de Salinas MAs. The Coalinga MA is included in the proposed ACEC and subsequent management plan primarily for the kit fox and leopard lizard. An HMP is not proposed for the Central San Joaquin (East) because of the large number of small, scattered parcels.

51-2 It is not possible to detail the exact benefits to wildlife an adjustment from 102 AUMs to 66 AUMs would create. The changes as portrayed in the alternatives would result from increases or decreases in available forage from prescribed burning of chaparral areas or adjustments for unsuitable areas. The Draft EIS did point out estimated changes in deer numbers. We realize that changes in grazing use will not affect individual species the same way, as each have specific habitat requirements. It is true that reduced livestock use will not always mean increased wildlife use. Many species of wildlife benefit from light to moderate levels of livestock grazing.

51-3 Seven hundred pounds/acre of residual forage is equivalent to about 2 to 3 inches of stubble on an average. For actual watershed protection a lesser amount is known to be adequate (as little as 200 lbs./acre in some areas). We realize that 700 lbs/acre may not be adequate for all species of wildlife. It is intended to be a minimum figure. In years of above average rainfall, such as the last two, as much as 2,000 lbs/acre has been left after grazing. Based on actual use studies and observation, 700 lbs/acre is adequate to leave most of the forage in and around the base of shrubs intact. This provides important cover for nesting birds and upland game. Although leaving more may benefit wildlife, it will also economically impact many livestock operations. Base AUMs, mulch management and allotment categories are explained in Appendix I (Draft EIS). On the larger "M" and all "I" category allotments, regardless of the AUM figures shown, the allotments will be managed for residual mulch. That is, they will be monitored and when the desired residual mulch level is attained, the livestock will be removed. All other allotments will be authorized by animal unit months (AUMs) of forage that is estimated to be available on an "average" year. These leases consist of small, scattered parcels which are difficult to manage effectively.

51-4 We recognize the efforts of our agencies in the area of RTE and mineral development, and compatability is possible in most cases. Withdrawal of lands that are at a minimum prospectively valuable for mineral development would be against Bureau policy and an unnecessary lock-up of mineral/energy resources, particularly in light of our recognition of compatability.

51-5 Actions have been taken to restore the damages referred to. It is our intention under all alternatives to effect a closer working relationship with the mineral industry.

51-6 The disturbed habitat in the Panoche Hills even though rehabilitated is marginally suitable for the kit fox. The ACEC plan to be developed for the Panoche/Coalinga RTE area will consider the use of restoration measures where appropriate. The Panoche Hills Area, including the Griswold, Tumey and Ciervo Hills, would be closed to all motorcycle use under the Preferred Alternative. The Panoche Hills proper has been closed to motorcycles for a number of years. The area would remain open to four-wheeled vehicles on designated routes.

51-7 This has been revised. Refer to the Errata section for Chapter 1.

51-8 The intention of this proposal is to reduce total camping use in Clear Creek Canyon.

51-9 This has been revised. Refer to the Errata section for Chapter 1.

51-10 Because of the varied critical environmental concerns in the Clear Creek Area, the Bureau feels that an ACEC designation is the most appropriate means of focusing special management attention on this unique area. The ACEC will serve as an "umbrella" to tie together existing and proposed plans dealing with the ORV designation; rare plant habitat; asbestos hazards; unique soil, gem and mineral resources and critical watershed concerns. The ACEC represents a commitment from management to recognize and give high priority to managing these critical environmental concerns.

51-11 This location is outside the highly mineralized, serpentine area. As such it does not have the environmental sensitivity that is found in the Clear Creek Canyon.

51-12 This has been revised. Refer to the Errata section for Chapter 3.

51-13 This has been revised. Refer to the Errata section for Chapter 3.

51-14 This has been revised. Refer to the Errata section for Chapter 3.

#52

138 Marks Dr.
Hollister, CA. 95023
December 22, 1983

Area Manager
Bureau Land Management
P.O.Box 365
Hollister, CA. 95024

Re: Alternatives to the Clear Creek Area.

Dear Mr. Howell:

As a member of the San Benito County Planning Commission I have followed the development of the Draft Resource Management Plan and Environmental Impact Statement for our county with close attention.

My particular concern is the development of the plan in the Clear Creek Area. I was greatly disappointed to find that in the four alternatives listed not one offers to decrease or stop the
52-1 use of the land by Off Road Vehicles. This area is subject to great erosion. The asbestos-laden silt sifts down to Hernandez Dam. I am sure that George Thomas, our Water District Manager, has expressed his concern about this problem.

Of even greater concern to me than the erosion, however, is the fact that asbestos particles are stirred into the air by the O.R.V.'s. I visited Clear Creek last Spring and was given a pamphlet with recommendations to use, i.e. face mask when operating an O.R.V., and to wash clothes separately on returning home. This
52-2 is frightening!! I do not believe that Clear Creek should be considered a recreational area when such a health hazard is involved. Surely there are better places to operate O.R.V.'s than through asbestos fields.

I understand that there is current research to see if asbestos in water may carry cancer producing elements. As long as there is any doubt, I think all recreational activity should be halted.

My third concern has to do with native plants. This is a unique eco-system and needs protection. Fences do not stop O.R.V.'s
52-3 as people working in the area well know. One of the mitigation measures recommended is to increase the monitoring, but budget constraints would not allow for adequate monitoring of this large section.

I hope that careful consideration will be given to developing an alternative that addresses the problems I have mentioned.

Sincerely,

Margaret Gabriel

Margaret Gabriel

cc: George Thomas - Manager San Benito County Water Conservation & Flood Control District.

Rocky Lydon - County Supervisor.

Rob Mendiola - Director of Planning - San Benito County.

Ed Hastey - State Director - Bureau Land Management.

Response to Letter No. 52

52-1 See the responses to Comments 8-4, 8-5, 15-2, 15-3 and 15-7.

52-2 The past and present course of action with respect to the asbestos hazard has been based on a policy of informed choice. The proposed ACEC represents a commitment to intensifying the present asbestos awareness program.

52-3 See the response to Comments 15-4 and 15-6.

FRESNO COUNTY SPORTSMEN'S CLUB LIMITED

#53

AFFILIATIONS
Sportman's Council of Central California
California Wildlife Federation
Fresno County & City Chamber of Commerce
California Natural Resources Federation

POST OFFICE BOX 12265
FRESNO, CALIFORNIA 93779

National Wildlife Federation
National Rifle Association
Ducks Unlimited, Inc.
Duck Hunters' Association

December 20, 1983

Mr. David E. Howell
Hollister Resource Area Manager
Bureau of Land Management
P. O. Box 365
Hollister, California 95023

DEC 1983 RECEIVED U.S. DEPT. INTERIOR BUREAU OF LAND MANAGMENT HOLLISTER, CALIF.

Subject: Draft E.I.S. Hollister Planning Area

The Public Lands Committee of the Fresno County Sportsmen's Club have reviewed the Resource Management Plan & Environmental Impact Statement and have the following comments.

We liked many aspects of Alternative #1 and #1A, but we do not believe that it is a practical solution to the complex management problem. We do not believe that there is any possibility that livestock AUM's will be reduced by the amounts indicated under Alt. #1 or completely eliminated as indicated for #1A; therefore, we have given Alt. #1 and #1A no further consideration.

Alternative #2 came the closest to meeting what we believed to be a practical plan for the management of many different and complex areas. We believe that a reduction in livestock numbers and better distribution is solely needed. We agree that Upland game and RTE habitat must be improved. Prescribed burning is needed in most all of the Planning Areas. Your proposed Recreational Use seems reasonable. We agree that some scattered plots of public land should be traded, transferred or sold, but not the amount proposed under Alt. #3. And naturally, we favor all the wildlife habitat enhancement that can be provided in a balanced management program. We even liked the Title of Alternative #2 - "Balanced Use".

Alternative #3 Maximize Production. The intensity of livestock use under this alternative was a real "turn-off". The almost complete lack of opportunity to improve wildlife habitat makes the plan anything but multi-purpose. The lack of protection for Cultural Resources and RTE habitat is completely unacceptable. In short, Forget it.

- 1 - (continued)

Alternative #4 Present Management. Really isn't too bad. The Bureau has made many changes in the past thirty years. We have approved of almost all of your actions. The habitat improvements that have been accomplished, the gulley plugs, spring developments, exclosures, prescribed burns, campgrounds and all the other projects - we feel have been steps in the right direction. Steps toward the preservation of the soil, water, vegetation and wildlife. However, we feel that the adoption of Alternative #2 would allow you to manage the resources in a more balanced and beneficial manner.

The Fresno County Sportsmen's Club, therefor, strongly recommends the adoption of Alternative #2 as the Resource Management Plan for the Hollister Resource Area.

We do have some concerns which we would like you to consider in the formulation of the final Management Plan.

53-1 1. That existing Riparian Habitat be given special protection in all management plans.

53-2 2. That additional protection should be indicated to more fully protect RTE species and their habitat.

53-3 3. That the fencing of springs and seeps be given a high priority - to prevent the destruction of critical water supplies.

53-4 4. That full consideration be given to the long term benefits derived from gulley plugs and check dams.

53-5 5. That un-even age brush fields will provide long term habitat benefits, for many species of wildlife.

53-6 6. That the most critical areas of property line trespass - be marked by installing a colored steel post at 300 yard intervals along the property line.

53-7 7. Our Committee has always recommended that at least 1000 lbs. of forage be left at the close of the livestock grazing seasons. We have several reasons for this recommendation (a) In grassland, 700 lbs. per acre does not leave adequate cover for wildlife larger that a grasshopper. (b) By leaving additional cover - errosion is reduced. (c) If more nutrients are removed from the soil than is being generated - then the quality of the soils can only decrease. As the wise conservationists say: "Take some, and leave some".

53-8 8. That livestock numbers should be reduced whenever, it will be biologically helpful to the environment. We also believe that grazing allotments should have periodic rest periods. So the grasses and forbs can grow to maturity, produce seeds and the RTE plants can have an opportunity to recover from heavy use.

53-9 9. That, small scattered parcels of public land that are proposed for sale, should be carefully studied for their RTE species and wildlife values and if such values exist the parcels should be offered to State Agencies - before being offered to local landowners.

10. It is our hope, that the Martin Ranch Recreation Area will become a reality and the pressure for more and more areas for

ORV use will diminish. We recognize the desire for motorcycle and 4-wheel drive enthusiasts to have room to enjoy their type of recreation and we support the acquisition of areas that can be devoted to that type of use. We also recognize that it is necessary to limit excessive use of any type; be it cattle, rockhounds, hunting or ORV use - as necessary to preserve the quality of the environment.

The Fresno County Sportsmen's Club appreciates the opportunity to comment on your Management Plan and to offer our assistance in future wildlife enhancement projects.

Sincerely yours,

Claude Brown & Hank Doddridge
Public Lands Committee
Fresno County Sportsmen's Club
(Phone: 209-255-2159)

HD/pd

Response to Letter No. 53

53-1 The importance of riparian habitat is considered by Bureau policy. Management of significant riparian habitat is addressed by the RMP and will be given site-specific attention in HMP development.

53-2 RTE species are given consideration by Bureau policy. This is reiterated in the RMP on a general planning area-wide basis and specifically in those areas with significant RTE concerns. RTE species have been and will be given consideration in HMP development.

53-3 This is covered by planning area-wide policy in the RMP and will also be given site-specific consideration in AMP and HMP development.

53-4 The use of gulley plugs and check dams is listed under mitigation measures. They will be considered where appropriate.

53-5 The objective of maintaining uneven-aged brushfields is stated in the proposed prescribed burns for habitat improvement.

53-6 This suggestion will be given consideration in boundary posting/identification plans.

53-7 See the response to Comment 51-2.

53-8 The concept of rest is good but is applicable mainly to perennial rangelands. Management of annual ranges is aimed at allowing the plants to produce seed and leaving sufficient mulch to promote favorable growing conditions in the fall. Where management is concerned with the protection of perennial shrubs, such as saltbush, a season of use (such as outlined in the Panoche Hills Management Plan) will allow livestock use at times of the year to prevent browsing on the shrubs. Where RTE plants are a concern, they will be protected by fencing or a grazing system that considers their individual needs.

53-9 It is Bureau policy to determine the presence or absence and value of each parcel for RTE species, cultural resources, etc. prior to sale. If significant values were associated with a parcel or parcels it would remain in public ownership.

#54

County of FRESNO

Planning Department

R. Ann Siracusa Director

December 21, 1983

David E. Howell
Hollister Resource Area Manager
Bureau of Land Management
P. O. Box 365
Hollister, CA 95023

Dear Mr. Howell:

Subject: Comments - Hollister Planning Area Resource Management Plan EIR

The Fresno County Planning Department has reviewed this document and has determined that all project areas are located within Westside Rangeland, Eastside Rangeland, Public Lands and Open Space or Resource Conservation Designations of the County General Plan. All Plan alternatives discussed in the Draft EIR are consistent with these designations. There are no identified adverse impacts of the Plan.

Sincerely,

R. Ann Siracusa
Director of Planning

RAS:mc

DEC 1983
U.S. DEPT. INT. INTERIOR
BUREAU OF LAND MGMT.
HOLLISTER, CALIF.

4499 East Kings Canyon Road/Fresno, California 93702/(209) 453-5008
Equal Employment Opportunity – Affirmative Action – Handicap Employer

Response to Letter No. 54

Thank you for your comments.

Molycorp, Inc.
Domestic Exploration Department
94 Inverness Terrace East Suite 200
P.O. Box 3976
Englewood, Colorado 80155
Telephone (303) 790-7600

#55

union MOLYCORP

December 22, 1983

Mr. Robert D. Rheiner, Jr.
Bureau of Land Management
P.O. Box 365
Hollister, CA 95023

Dear Mr. Rheiner,

We have identified the following issues which should have major considerations in regard to the Proposed Management Plan for the Hollister Planning Area concerning oil, gas, and mineral development.

1. The Resource Management Plan lists 1,442 mining claims in the area. The following reserves have been identified: asbestos, mercury, chromite, bentonite, magnesite, diatomite, and tungsten. Future management plans should encourage and support production of any economic commodity.

2. Many of the areas contain potential for the following mineral commodities: gold, silver, lead, zinc, copper, and uranium. Future management plans should support exploration efforts in order to adequately evaluate any undiscovered mineral resource potential. 55-1

3. The area has proven to be a major producer of oil and gas. There is still a high potential for future oil and gas discoveries and development.

4. The planning area has a potential for geothermal development.

Exploration and development should be encouraged and maximized for all of these commodities because of their future benefit to mankind. Therefore, we feel the most acceptable proposed management plan is Alternative III which will encourage and maximize future production.

Thank you for consideration of our views.

Sincerely,

Gregory P. Wittman
Geologist

GPW/bv

cc: John Wells
W. Glen Zinn

Response to Letter No. 55

55-1 Under the Preferred Alternative, 98 percent of the planning area would be open to all exploration and development within multiple-use constraints. Approximately 2 percent of the area would be precluded from locatable mineral exploration or development because of protective withdrawals. These areas would remain open to mineral leasing or sales.

#56

UNIVERSITY OF CALIFORNIA, BERKELEY

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COLLEGE OF NATURAL RESOURCES
DEPARTMENT OF PLANT AND SOIL BIOLOGY

106 HILGARD HALL
BERKELEY, CALIFORNIA 94720

December 26, 1983

David E. Howell, Manager
Bureau of Land Management
P.O. Box 365
Hollister, California 95023

Dear David:

Referring to our discussion on the Clear Creek Area at the public meeting in San Jose on November 2, 1983, I should like to add the following comments. They are a continuation of my remarks in the letter to David Lehmann, August 24, 1981.

As in 1981, I and my soil and ecology colleagues Professors E. Begg and A. Schultz are still amazed at the vast areas of bare lands composed of deep soils with good textures that should carry abundant vegetation, were it not for some, as yet unknown, chemical imbalance. As reported in my former letter, Dr. J. Vlamis could not elucidate the cause with greenhouse pot tests, including gypsum, and recent analyses done in Prof. Harvey Doner's lab do not demonstrate for the 3 soils a consistent pattern with total contents and exchangeable forms of toxic nickel and chromium. Further, the two elements copper and mercury are not unusually high in the samples collected. Evidently, extensive, prolonged laboratory and field experiments are needed in the future, and microbiological studies may be called for as well. The problem is of great scientific interest to soils people, botanists, microbiologists and invertebrate zoologists, and its solution may have wide beneficial application because serpentine soils of less extreme character are widespread in California and elsewhere.

56-1 Accordingly, I should like to suggest that critical research areas are set aside permanently for future research, demonstration and teaching as an open-air museum of landscape features, and as benchmarks to assess long-time soil changes (e.g. erosion) induced by off-road vehicles and other human disturbances. The protection of barren areas should include fringes of plant-covered serpentine areas because the transition zones may offer pertinent clues.

Fortunately the "San Benito Mountain Natural Area" contains some of the required segments of soils and vegetation, but its 2000 acre extent is but a small fraction to be saved for future generations out of 30,000 acres of the Clear Creek Serpentine Area. Moreover, this area should be protected from extensive manipulation for research purposes as visualized with future agronomic and silvicultural type field experiments.

56-1 Cont.

My first suggestion for your consideration is the addition of appendixes to the Natural Area, such as west-side additions of portions of Sections 5, 8, 9, 15, all T18S, R12E, and east-side additions, such as in Section 14, also T18S, R12E. Not having been there recently, I must rely on the expert knowledge of your staff.

56-2 My second suggestion deals with the dramatic landscape of the west side of Clear Creek, particularly Sections 2, 11 in T18S, R11E. Some of the soils have been severaly damaged by ORV, causing deep erosion crevasses, but the combination of all influencing factors, natural as well as man-made, offers an ideal set up for study, medium scale experimentation, and monitoring.

Hoping that you will find my comments helpful in your difficult decision-making process,

Sincerely yours,

Hans Jenny
Professor Emeritus

Response to Letter No. 56

56-1 The Bureau agrees with your assessment of the unique serpentine soils in the Clear Creek Area and would welcome research proposals from qualified individuals or institutions. The direction for designation and protection of important study areas has been incorporated into the ACEC for the Clear Creek serpentine area (see Chapter 2, Errata). We are willing to work with you or your colleagues in identifying site-specific locations that would constitute acceptable study areas. The existing San Benito Mountain Natural Area and proposed extension encompasses approximately 2,000 acres and all or portions of Sections 5, 9, 14 and 15 of T.18S., R.12E.

56-2 In the context of the ACEC, the Bureau will work with you or your colleagues to set aside small, discrete study plots or locations in these areas.

#57

107 Bluefield Drive
San Jose, California 95123
December 26, 1983

Area Manager
Bureau of Land Management
P.O. Box 305
Hollister, California 95023

Dear Sir:

I have reviewed the "Hollister Planning Area Resource Management Plan & Environmental Impact Statement", and participated in the area discussion held by BLM at the Willow Glen High School, here in San Jose. As Public Lands Committee Chairman of the Santa Clara Valley Gem and Mineral Society, I have prepared the following comments in their behalf. We are primarily interested in "rockhounding", including gem and mineral collecting; therefore, the comments apply most specifically to the Clear Creek / Condon Peak Management Area.

"Alternative 2 - Balanced Use" appears to be an excellent overall choice, and truly balanced. It provides access to a very unique mineralogical area to hobbyists interested in rocks and minerals as a form of recreation. These "rockhound" hobbyists are an expanding segment of the general public.

Of the four alternatives presented, most of our group agree that Alternative 2 is generically in our best interest. I do, however, want to furnish additional comments on the overall "Draft Plan". My approach will be to make comments to specific pages and paragraphs.

57-1 Pg 2-2 Clear Creek Serpentine Area
a. I am not sure what is meant by, "Designate 30,000 acres *** Clear Creek watershed".

57-2 b. The impact of ORV's, mining, and other activities on the overall creek sedimentation must be established. It is very possible that natural erosion creates more creek born sediment than all of the human activities combined.

Pg 2-3 Subpar 2. - The acquisition of additional lands by BLM in the Clear Creek Area could do much to enhance its recreational potential for ORV users and rockhounds.

57-3 Pg 2-4 Subpar 10. - Volunteers have done much to assist BLM in maintenance of the Clear Creek roads and areas frequented by recreationists. An example is the annual "Clean Up" sponsored by the junior members of the local "rock clubs". Their continued support can be assured.

57-4 Pg 2-4 Subpar 11. - If withdrawal is required for commercial mineral production under existing Federal regulations, a limited access agreement with the mineral claimants would be desireable. The limited access would be to permit rockhounds to "search" the surface areas, under claim, during specific periods of time. One or two long weekends each year might work out well; i.e., the 4th of July and Labor Day.

Pg 2-31 - "Oil, Gas, and Minerals" - Ideally, the whole Clear Creek area would minimize commercial exploration, permitting maximum utilization by hobbyists interested in gems, minerals, and lapidary materials.

Pg 2-32 - "Recreation" - Wholehearted support is given to Alternative 2, Balanced Use.

Pg 2-32 - "Land Tenure" - Wholehearted support is given to Alternative 2, Balanced Use.

Pg 3-11 - "Recreation" - Rockhounding has become more popular as a form of recreation in recent years. The number of devotees is increasing by leaps and bounds each year. Likewise, the annual total hours of rockhounding activity (Table 3-7, Pg 3-13), can be expected to increase greatly. If any kind of improved camping facilities are provided, the overall recreational activity will noticeably increase. I'm sure the ORV's and hunters use will also increase with improved facilities.

Pg 3-29 - "Water" - This paragraph discusses general water availability / distribution in the overall planning area. It is noted that runoff is not uniform throughout the rainy season. Again, does the occasional heavy runoff in the Clear Creek area create more of a sedimentation problem downstream than the recreational users, including ORV's?

57-5

Pg 3-53 - "Recreation" - The Alternative #2 writeup presented here appears in the best interest of the recreationists. There are two suggestions that might improve the BLM image in the publics eyes.

57-6 1. Contact one or more Santa Clara / San Benito County rockhound clubs and request an on site meeting with a limited number of knowledgable members to physically locate areas that are known sources of specific gems, minerals, and lapidary materials. Hopefully, these areas could be withdrawn or segregated

from mineral exploration and exploitation; however, non-commercial collecting would be permitted, providing only hand tools were used. Of course, explosives of any kind should be prohibited.

57-6 Cont. Many articles have been written on the mineral locations within the Clear Creek Area. One such article appeared in the April, 1965, issue of Gems and Minerals, pages 28 - 32. It was titled, "Minerals of Southern San Benito County, California", by William P. Moller, and contained a brief description of the geology of the area, descriptions of some of the minerals found, with directions on where to find them. A comprehensive report on Clear Creek Jadeite is, "Jadeite of San Benito County, California", by H.S. Yoder and Charles W. Chesterman. It covers Jadeite locations and some geology related to those locations. This report can be found in the California Division of Mines and Geology Special Publication 49, titled "California Jade, A Collection of Reprints".

57-7 2. Contact several ORV organizations and request a similar meeting as in 1, above. The objective here would be for discussion, and possible demonstration, of those areas desired to be open by the ORV users versus areas considered hazardous to the natural terrain or environment by the BLM or environmental protectionist groups. A visit to ORV desired areas, with rational for selection, could be examined and discussed openly. If a specific area presents an extreme environmental impact potential, substituting another area may present the same ORV challenge, but with less environmental impact.

57-8 Pg 3-54 - "Land Tenure" - The possible acquisition of lands near the Clear Creek entrance would enhance the potential, and definitely increase the recreational use of the total area. A review of the map, showing BLM responsibility, appears to have much acreage that is locked from public access, or small isolated parcels that must create a tremendous supervision problem. Property consolidation via land exchanges could provide the potential for additional land acquisition at the Clear Creek entrance.

57-9 Pg 3-55 - "Water Resources" - The written word and the impact statement implies that recreational vehicle use of the Clear Creek area is the major contributor to the siltation problems of Hernandez Reservoir. Sediment from Clear Creek drainage may be a major contributor to siltation of the reservoir; but, a study should be conducted to determine how much of the silt carried to the reservoir is caused by recreational use in the Clear Creek drainage area, and how much is caused by natural erosion and the effects of natural forces - freeze, thaw, rain, wind, etc. In addition, a study should also be conducted to determine what percentage of the silt may originate upstream from Clear Creek on the San Benito River and its drainage area.

57-10 Pg 4-26 - "Recreation" - The increase of 30,000 visitor hours shown for Alternate 2 over Alternate 4 is probably an under estimate. If improved camping / staging areas are provided, the increased use will be more dramatic. If any improvement can be made in the roads and creek crossings, recreational visitor hours could increase dramatically. (With the above improvements, I personally would increase my visitor hours by a factor of five).

Pg 4-65 - The discussion pertaining to initial construction of recreational facilities and the short term impact is obviously correct. The long term increase in recreational opportunities will more than offset that short term impact. This is a unique area with an extremely high potential for recreational use. It is probably the only area of its kind in California, and particularly so if you consider its nearness to major population concentrations.

If there is anything I can do to clarify any of the above comments, arrange meetings with members of the Santa Clara Valley Gem and Mineral Society, or in any other way assist in further review and evaluation of your "Resource Management Plan & Environmental Impact Statement", please do not hesitate to call or write. I can be reached at work on 408-925-6736, or at home on 408-578-7067.

Sincerely,

Frank M. Monez

Frank M. Monez

Response to Letter No. 57

57-1 The designation refers to the proposed Area of Critical Environmental Concern (see page 2-1 in the Draft EIS).

57-2 See the response to Comment 8-4.

57-3 The Bureau sincerely appreciates all the past help and support of the Santa Clara Valley Gem and Mineral Society and other rockhound clubs. We would encourage other groups to become as actively involved in assisting the Bureau with this type of support.

57-4 Proposed withdrawals would preclude locatable mineral development for the protection of other resource values, with allowance for hobby collecting. In order to collect on areas under existing mining claims an agreement would have to be negotiated with the mining claimant and private groups or individual collectors involved. Negotiation of access agreements are not within the scope of Bureau authority. Mining claim recordation information is available at all Bureau offices.

57-5 See the response to Comment 8-4.

57-6 This suggestion has been incorporated in the proposed Area of Critical Environmental Concern (ACEC) for the Clear Creek serpentine area. Under the Preferred Alternative, proposed withdrawals would protect significant locations in the Clear Creek Canyon and San Benito Mountain Natural Area. Significant locations outside these two areas would be protected within the framework of the ACEC designation. Subsequent to identification of these locations and if additional protection was deemed necessary, it may be possible to effect protective withdrawals for small, site-specific locations at a later date.

57-7 Protection of environmentally sensitive areas is provided for in the ORV designation completed in 1982. Implementation of site-specific protection measures is being discussed with the advisory committee which consists of representatives from motorcycle groups, four-wheel drive groups, rockhounds, hunters and environmentalists.

57-8 The Bureau feels that such consolidation would decrease supervision and trespass problems. In addition, it would reduce the asbestos hazard and impacts to rare plant habitat in Clear Creek Canyon. Total recreation in the area would increase but not significantly. (See page 4-26 in the Draft EIS).

57-9 See the response to Comment 8-5.

57-10 From 1977 to 1982 there was a 25 percent decrease in ORV use in the area. We anticipate that other uses such as rockhounding and hunting will increase relative to ORV use. An increase of approximately 33 percent is anticipated under the Preferred Alternative. We anticipate less of an increase in ORV use (approximately 5 percent) due to the declining trend.

#58

SUBJECT: MOTORCYCLE RIDING
PROBLEM: CLEAR CREEK

Clear Creek area has been used for mining, hunting and motorcycle riding.

58-1 It is no secret that motorcycle riding has produced the most damage to Clear Creek.

Motorcycle riding is a very popular sport and is growing every year. If motorcycle riders continue to ride the same ground erosion will continue and it will ruin the area for everyone.

If the BLM would allow other areas to be used for motorcycle riding, and decrese the number of motorcycle riders that ride Clear
58-2 Creek, nature will be able to restore the area.

An alternate area that comes to mind is, Mercy Hot Springs, another is the Clear Creek area, on the other side of Union Carbide Plant. There must be hundreds of thousands of acres of land that could be used. Why force a large number of riders into the same area week after week and then have people complain about the erosion.

58-3 If money is an issue, then get it from the green sticker fund.

I think that rotating areas every two to three years helps everyone, and preserves what nature gave us to enjoy.

A.T. PELLEGRINO

DEC 1983
U.S. DEPT. INT. BUREAU OF LAND MGMT. HOLLISTER, CALIF.

Response to Letter No. 58

58-1 See the response to Comment 8-4.

58-2 The Mercey Hot Springs or Panoche Hills Area was closed to ORV use in 1970 due to environmental damage and conflicts with grazing lessees. The area constitutes habitat for two federally listed and one state listed endangered species, a rare plant and significant paleontological resources. Studies have shown that ORV use in this area can significantly increase soil erosion.

We agree that overuse in the Clear Creek Canyon has contributed to some of the sedimentation problems. Our plans include methods to disperse ORV use in the 43,000 acre Clear Creek Area while protecting environmentally sensitive areas. The Preferred Alternative also considers limited ORV activities in the Sierra de Salinas and Williams Hill areas as well as cooperating with the State of California on the 45,000 acre Martin Ranch OHV proposal east of the Clear Creek area. The latter proposal should help to disperse use from the Clear Creek Area as you have suggested.

58-3 Green Sticker funds are being utilized to provide for continued ORV use in the Clear Creek Area while protecting environmentally sensitive areas. Purchase of the Martin Ranch would be accomplished by the State with the use of Green Sticker funds.

#59

County of FRESNO

Parks Division

December 23, 1983

David Howell
Hollister Resources Area Manager
Bureau of Land Management
P.O. Box 365
Hollister, CA 95023

RE: Draft EIS Hollister Planning Area

Dear Mr. Howell:

The Resources Management Plan and Environmental Impact Statement has been reviewed by Fresno County Parks Division staff and we are basically in agreement with Alternative #2 Management Plan.

However, we would like to see much more emphasis and detail applied to the recreational uses in the plan. Specifically, in people oriented uses. We would like to see a further expansion of such statements as "have potential opportunities for off road recreation vehicle (ORV) use". These areas seem to be quite vague and should be expanded upon. It is also felt that the numbers indicated for recreation uses, such as hunting, rock gathering, ORV use, etc., listed in "visitor hours" could somewhat be expanded upon. We would like to see more definitive plans on the exchange of lands or purchase of easements to provide both walk-in and vehicle access for the residents of the adjoining counties, especially in areas adjacent to Interstate Highway 5. This would
59-1 include a vehicle access to the Clear Creek Recreation Area from the eastern side of that unit. Unless, of course, the Martin Ranch acquisition by the State is realized.

We feel that with adequate public access, proper management, and the proper education of public users there would be far less trespassing and vandalism of private lands than there is presently.

To summarize our concerns, we would like to see as much emphasis being placed upon multiple uses, including public recreation, as has been given to grazing
59-2 and other issues. Fresno County Parks Division has maintained an excellent joint working relationship with the Bureau of Land Management on it's adjoining lands and wants to continue to provide a recreation based experience for those that use Bureau of Land Management lands from the surrounding areas.

Sincerely,

William R. Blain
Parks Superintendent

WRB:jb

2220 Tulare Street 8th Floor/Fresno, California 93721 (209) 488 3004
Equal Employment Opportunity — Affirmative Action — Handicap Employer

Response to Letter No. 59

59-1 The level of detail you mention would be contained in site-specific activity plans to be prepared subsequent to the RMP. An example would be the Panoche Hills Management Plan or the Coalinga Mineral Springs Recreation Plan which you have had past involvement with. The RMP provides the basic objective(s) such as providing additional recreation opportunities for a particular management area(s). The activity plan will focus on how to accomplish the objective(s).

59-2 The issue of recreation use was considered in the context of other multiple-uses on a planning area-wide and management area specific basis.

#60

UNITED STATES DEPARTMENT OF AGRICULTURE
FOREST SERVICE

Sierra National Forest
Federal Building, 1130 O Street, Room 3017, Fresno, California 93721

1920
DEC 27 1982

Dave Howell, Area Manager
Bureau of Land Management
P.O. Box 365
Hollister, CA 95023

Dear Dave,

In regard to the Draft EIS and Plan for the Hollister Planning Area, our only concern is associated with the Squaw Leap Management Area.

60-1 We strongly support development of a trail from Squaw Leap to tie in with trails on the Sierra National Forest. This would complete a key section of the Fresno to Millerton Lake to Sierra NF to Mammoth trail system. This is a highly desirable trail network for the Fresno community and would receive substantial use. Therefore, we urge you to give aquisition of the necessary easements across private lands and construction of the trail high priority in your final plan.

The Forest will support you in any way possible to obtain the needed right-of-ways or to find suitable alternative routes for the trail.

60-2 A final editorial comment concerns your visitor use table on pages 3-13. It would be helpful to know the use was averaged for a number of years. What years were used to determine the average?

Thank you for the opportunity to provide input.

Sincerely,

John L. Kruse

for RICHARD L. STAUBER
Forest Supervisor

Response to Letter No. 60

60-1 The Bureau acknowledges the importance of such a trail system to the public. We fully support the proposal and will cooperate with the National Forest Service in acquisition of the necessary easements and trail construction as funding permits.

60-2 Visitor use in the Squaw Leap Area is based on data collected over the last ten years from a photoelectric trail traffic counter, trail register and actual visitor counts.

ALAN CARLTON
ATTORNEY AT LAW
2005 PLEASANT VALLEY
SUITE 311
OAKLAND, CA. 94611

David Howell
Area Manager
Bureau of Land Management
P.O. Box 365
Hollister, CA 95023

Re: BLM Hollister Area Plan

The following comments are my own individual comments. I write them in the form of comments from environmentalists because I believe that they represent the views of environmentalists everywhere. I am a member of the Wilderness Society, the Sierra Club, the Nature Conservancy, the Sempervirens Fund, the Save The Redwoods League, the Save The Bay Association, and other environmental organizations. I do not officially represent any of their views, but I am confident that their positions and mine are similar.

Sincerely yours,

Alan Carlton

Alan Carlton

GENERAL COMMENTS

ALTERNATIVES

While in general, environmentalists support Alternative 1, "Maximum Protection", and oppose, Alternative 3, "Maximum Production," we take the position that certain parts of several alternatives should be supported in various areas. The following comments are directed toward general policies; specific areas are discussed below in specific comments.

LIVESTOCK GRAZING

Environmentalists do not oppose all grazing but do oppose grazing in unsuitable areas and grazing that reduces the wildlife AUMs.

FIRE MANAGEMENT

Environmentalists recognize the need for periodic burning. We support Alternative 1, which limits burning to the cool season, to protect sensitive plants and maintain natural vegetative diversity.

RECREATION

Environmentalists oppose ORV use of public lands. We especially oppose any increase in such use. ORV use destroys land and is incompatible with other uses of any land. We support development of trails and other opportunites for hiking and camping recreation. We oppose the development of roads that are primarily designed to improve hunting access. Hunters should have to go after game on equal terms.

LAND TENURE

Environmentalists support land trades in the consolidation of holdings. In general, we oppose disposal of public lands but recognize that certain small parcels are appropriate for such disposal. We also support consolidation of federal lands by combining management of adjacent parcels of federal land under the jurisdiction of different agencies.

VISUAL RESOURCES

Environmentalists support the maximum protection of visual resources, especially near parks and national monuments.

[illegible]

Environmentalists support the protection of paleontological resources.

RARE, THREATENED, AND ENDANGERED SPECIES

Environmentalists support the protection of the habitat of rare, endangered, and threatened species.

SENSITIVE PLANTS

Environmentalists support the protection of sensitive plant areas.

WILDLIFE

Environmentalists support game management for diversity purposes, rather than for increase of game species for hunting.

COMMENTS ON INDIVIDUAL ITEMS

CANYONS

Environmentalists question the need to acquire the easement road access, which primarily appears to result in a 5[illegible] visitor hour increase for hunters.

61-1 SIERRA DE SALINAS

Environmentalists question the need for the easement acquisition, which primarily increases hunter access from 5000 to 15,000 hours. Environmentalists also oppose the proposed increase in ORV access. Environmentalists support land consolidation and adjustment of boundaries with the National Forest.

PINNACLES

61-2 Environmentalists support increased access for hiking by development of trails connected with the national monument. We also support consolidation of the adjacent federal lands by incorporating BLM lands into the National Monument. Finally, we support wilderness designation for BLM lands adjacent to Pinnacles if they are not incorporated into the Monument.

CALL MOUNTAIN

Environmentalists support consolidation of land with the Clear Creek Recreation Area. We oppose any increase in ORV use or access.

PANOCHE HILLS

61-3 Environmentalists support the development of primitive camping facilities. We also support BLM wilderness designation for appropriate areas of Panoche hills.

GRISWOLD-TUMEY HILLS

61-4 Environmentalists support the easement acquisition of an access road, rather than construction of a new road. The access should be for hunting and hiking, not for ORV use. We support additional sensitive plant and endangered animal protection.

CLEAR CREEK

61-5 Environmentalists oppose any increase in ORV use and indeed [illegible] at all. This is especially important where there are [illegible] dams and water sedimentation damage. We also [illegible] mineral development and support the extension of the [illegible] and mineral separation. The unique vegetation and the wildlife in the area need protection.

CIERNO HILLS-SAN JOAQUIN SOUTH

Environmentalists support increased access for recreational use. We support consolidation of federal land in this area. We oppose any development of a ORV park by state or federal agencies. We support further protection for vegetation, wildlife, and paleontological resources.

COALINGA MINERAL SPRINGS

Environmentalists support the trail for access. We oppose any increase in mineral exploration or vehicular access.

COALINGA

Environmentalists support consolidation to protect rare [illegible] and endangered species. We oppose all ORV use.

[illegible]

Environmentalists oppose any increase in ORV use. We support exchange of isolated parcels rather than disposal.

WILLIAMS HILL

61-6 Environmentalists oppose any increase in ORV use or [illegible] ORV access. We support suitable exchange of isolated parcels of public lands.

CENTRAL SAN JOAQUIN

Environmentalists support consolidation of land with the national forests and exchange of other isolated parcels.

COLAWTON

Environmentalists support acquisition of land for the Milestone Isle to Sierra National Forest trail.

We oppose all ORV use. We support protection of the wildlife and protection of the habitat conditions, with emphasis on fish mitigations. We also support protection of the unique archaeological resources.

SOUTH BAY

Environmentalists support management of areas adjacent to Henry Coe State Park compatibly with uses in that park or consolidation of federal lands adjacent to the Park with the Park. We support exchange of scattered parcels of public land to consolidate other parcels. We oppose all ORV use of public lands.

Response to Letter No. 61

61-1 The area currently has no public access whatsoever. The easement acquisition would provide access for birdwatchers, hikers and sightseers although the majority of the use would probably be from hunters. Vehicle use would be limited to designated routes in these areas.

61-2 Lands in the vicinity of the Monument would be retained and managed under a cooperative agreement. Wilderness designation is being considered in the Draft EIS for preliminary wilderness recommendations for Central California Study Areas, 1982.

61-3 See the above response regarding wilderness.

61-4 Under the Preferred Alternative, the area would be closed to motorcycle use (vehicle use limited to four-wheeled vehicles on designated routes).

61-5 See the response to Comments 1-1 and 18-3.

61-6 The Preferred Alternative does not consider any increases in ORV use or additional access development in this area.

#62

PACIFIC GAS AND ELECTRIC COMPANY

77 BEALE STREET • SAN FRANCISCO, CALIFORNIA 94106 • (415) 781-4211 • TWX 910-372-6587

J. W. PAGE
MANAGER
LAND DEPARTMENT

December 27, 1983

File: 680.4

Area Manager
Bureau of Land Management
Post Office Box 365
Hollister, California 95023

Dear Mr. Howell:

Thank you for the opportunity to comment on the "Proposed Resource Management Plan for the Hollister Planning Area" dated July 1983. As you are aware, PGandE has extensive facilities within this region. In addition, we are considering plans for new transmission lines and possibly, communication installations in this area.

We generally support your preferred alternative recommendation. Alternative 2 represents balanced land management policy providing necessary opportunities for utility expansion.

We do, however, have two concerns:

62-1 1) PGandE is currently completing feasibility studies for a third 500 kV transmission line. It would generally parallel 1/2 mile westerly of the two 500 kV transmission lines running through Panoche Hills, Clervo Hills, and Kettleman Hills. This line is a critical segment in the interregional power transfer system linking the Northwest and southern California. Additional lines for future mineral and energy developments throughout the Resource Area could be required, depending on location. Restricting all future lines to corridors could be impractical. Instead, we suggest corridor use be encouraged through application of categorical exclusions. This would allow sufficient flexibility for future energy resource development.

2) Communication Sites--Limiting new communication installations to existing sites policy for visual protection purposes seems overly restrictive. New sites could be necessary to use technological advances in computer communication networks and to put increasing sophistication in automated power dispatching to maximum beneficial

62-1 Cont. use. We suggest incorporating flexibility in siting new communication facilities, especially when considering the significance of public benefit served.

If you have any questions concerning our comments, please contact Diane McQuarie at (415) 541-5774.

Sincerely,

MPIngram:sa

Response to Letter No. 62

62-1 Categorical exclusions are available and would be considered on a case-by-case basis depending on the location, possible impacts and resource values involved. Outside of designated corridors or existing locations, utility rights-of-way would be considered on a case-by-case basis, if significant public benefits can be demonstrated. These actions may be subject to a plan amendment.

AtlanticRichfieldCompany 555 Seventeenth Street
Denver, Colorado 80202
Telephone 303 293 7577

J. R. Mitchell
Manager
Public Lands Coordination
Government Relations

#63

December 28, 1983

Mr. David E. Howell
Hollister Resource Area Manager
Bureau of Land Management
P.O. Box 365
Hollister, CA 95023

Re: Hollister Planning Area
Draft Resource Management Plan and
Environmental Impact Statement

Dear Mr. Howell:

Atlantic Richfield Company appreciates the opportunity to comment on the Draft Resource Management Plan and Environmental Impact Statement.

As shown on the attached Energy and Mineral Resource Evaluation Forms, the oil and gas potential of major portions of the Resource Area is good to excellent with existing leases occurring throughout most of the Management Areas and some areas unexplored at this time. We support your efforts in developing a plan which considers energy and mineral exploration, development and production a primary land use. Where
63-1 energy and mineral resource values are not an overriding concern, protecting, through mineral segregaton and ACEC's, those areas which seem to be most sensitive, is reasonable.

We would like to point out that these evaluations reflect current knowledge and technology and must be subject to modification should new information become available. This is especially true due to the nature of exploration activities and the possibilities that new information or technology could shed new light on
63-2 the areas' potential.

You will note that we used the BLM's energy and mineral evaluation form that appeared in a Federal Register notice on July 27, 1983. We believe that the BLM should utilize the information reflected on the energy and mineral evaluation forms when making planning recommendations.

63-3 The Rocky Mountain Oil and Gas Association has developed a matrix review process which shows access constraints and geologic potential in matrix form. A copy of their report is attached. We suggest the BLM use this matrix format to better assess the effects of their decisions on the possible development of energy and mineral resources. The matrix system was designed to utilize the information provided by the evaluations. However, the evaluation system may be used independently from the matrix system.

We appreciate this opportunity to provide the BLM with these evaluation forms. We believe that such a system is the best way for industry, as well as government agencies, to provide federal land management agencies with relevant energy and mineral potential data. In addition, this system provides the BLM with industry contacts should additional information be needed.

If you have any questions regarding the content of the evaluation forms or their use in the matrix system, please give me a call.

Sincerely,

J. R. Mitchell

JRM:LJW:drm
Attachments

Response to Letter No. 63

63-1 Protective withdrawals would cover about two percent of the Planning Area under the Preferred Alternative. These withdrawals would not restrict or preclude oil and gas leasing, exploration or development. The Preferred Alternative also considers ACEC designations in areas with oil and gas potential, however, it is a stated objective of the ACECs to allow exploration and development to continue under stipulations to protect critical environmental concerns.

63-2 Thank you for providing us with this information which appears to support that which is already contained in the Draft EIS. This data will be filed with the existing inventory information on the oil and gas potential for the area. The RMP process is flexible and will be continually updated as new information becomes available.

63-3 Thank you again for providing us with this information. We feel that the Preferred Alternative provides for balanced development of mineral resources in the context of other multiple uses in the area. The Draft EIS has adequately assessed the potential impacts of proposed decisions on the mineral resource although we did so largely in a narrative fashion. The matrix appears to be a very useful planning tool, however, we do not feel it would be justifiable to extensively revise the EIS for its use at this time.

#64

CALIFORNIA ASSOCIATION OF 4WD CLUBS INC.

5831 Rosebud Lane, Unit M
Sacramento, CA 95841
(916) 338-4540

December 29, 1983

Bureau of Land Management
Mr. David E. Howell, Hollister Resource
Area Manager
P. O. Box 366
Hollister, CA 95023

Dear Mr. Howell,

The proposed resource management plan for the Hollister Planning Area has been reviewed. In general, we support the proposed alternative #2 which represents a balanced use. We can see some significant improvements between the present recreational activities in the areas and those shown in the proposed future management actions.

64-1 We do believe our proposed ORV staging and camping area near the entrance to Clear Creek should be developed as soon as possible to avoid problems with camping and intensive OHV use in the RTE areas, riparian zones and to minimize any possible risk of asbestos to human health.

64-2 The proposed acquisition of easement of 3 miles of road in the Panoche Road/Silver Creek area in lieu of 3 miles of new road construction will permit only 4WD access and excellent hunting opportunities. We suggest the use of state OHV grant funds for both the aforementioned campground/staging area and the Silver Creek Ridge easement.

64-3 We notice the increased emphasis on identification and protection of RTE species and paleontological sites in some of the areas. We strongly agree that all animals, plants and insects that are truly deserving of RTE designation should be provided the necessary protection as required. However, we also note a trend for the application of this act as a means of blocking or restricting development on certain types of uses in an area. It is our opinion that California has as many types and locations of RTE species as all the remaining states in the USA. This particular situation needs to be carefully evaluated, since it simply creates both an expensive and excessive work load for the Department of the Interior, possibly at the expense of some RTE species that deserve more attention.

page 2 cont'd.

64-4 The South Bay area contains land parcels adjacent to a proposed addition to the Frank Raines Park. The BLM lands would enhance the recreational opportunities in this area for both hunting and ORV recreational activities. We recommend this consideration be included in the balanced use alternatives. The need for public access to landlocked public lands has never been greater than the present. Those lands adjacent to Henry Coe State Park also deserve similar consideration for motorized vehicle access.

64-5 We believe that most of the areas involved in this study are capable of providing more wildlife potential, simply by developing more comprehensive wildlife habitat planning. We also recognize that most wildlife habitat planning is subject to budgetary restrictions and carries low priority. We recommend the use of volunteer group services as a means of accomplishing much of this type of work. WHMP requirements should be designed for this type of implementation.

We thank you for the opportunity to evaluate a well prepared draft resource management plan.

Sincerely,

Ed Dunkley,
Administrator

ED:mb

Response to Letter No. 64

64-1 This is consistent with the Preferred Alternative.

64-2 Under Alternative 4, the access road would be passable to four-wheel drive vehicles only. The Preferred Alternative would allow for the passage of most four-wheeled vehicles (including two-wheel drive pickups and some passenger cars). We would consider applying for Green Sticker grant funds but doubt that it would receive a high priority because of the primary goal of providing hunting opportunities in the area.

64-3 The Preferred Alternative considers ACEC designations for the most significant RTE habitat and paleontological areas. The ACEC designation is not necessarily meant to be exclusionary but will detail special management needs to protect these areas of critical environmental concern, while accomodating other uses.

64-4 The Preferred Alternative has been modified to allow for the consideration of making lands available to the county as necessary for inclusion in Frank Raines Park. Lands in the vicinity of Henry Coe State Park would be managed in a manner compatible with the Park.

64-5 The Preferred Alternative considers HMP development in areas of good potential. The wildlife program in the Hollister Resource Area has been assisted for a number of years by volunteers and contributors. Contributions, especially from the State and several counties, have made continuation of work possible in times of budgetary constraints. The Bureau will continue to welcome the help of volunteers and contributors whenever possible.

Southern California Edison Company

C. J. LOWENISON, JR.
MANAGER

December 30, 1983

Mr. David E. Howell
Resource Area Manager
Bureau of Land Management
P. O. Box 365
Hollister, CA 95023

Dear Mr. Howell:

SUBJECT: Draft Resource Management Plan and Environmental Impact Statement; Hollister Planning Area

Southern California Edison Company wishes to comment on the above subject DRMP and EIS even though we have not had the opportunity to formally review the document. We have the following comments and recommendations for your consideration.

Southern California Edison Company and the Western Utility Group (WUG) have identified the existing and future need for planned utility corridors, as outlined in the WUG's 1980 Western Regional Corridor Study. Maps showing the location of the required corridors in California have been furnished to Mr. Ed Lynch, Chief of Planning and Environmental Coordinator Staff, Bakersfield District.

65-1 The need for routing flexibility has been previously recognized by the Bureau as reflected in the California Desert Plan's designation of corridors 2 to 5 miles in width. We therefore recommend that corridors, a minimum of 2 miles in width, be designated in the RMP in the locations shown on the above mentioned maps.

If you are unable to designate any of the identified corridors due to conflicts with other resource values, we would appreciate the opportunity to work with your office to adjust corridor locations to mitigate the conflict.

We hope that you will give the above comments your full consideration before finalizing the RMP. If further details are needed, please contact Mr. L. R. Salas at (213) 491-2849.

Very truly yours,

C. J. Lowenison, Jr.
DAH

fedpermt/311/ldv

Response to Letter No. 65

65-1 Existing corridors, as designated in the Draft RMP/EIS, include most of the corridors shown on the Western Utility Groups (WUG) Western Regional Corridor Study maps. The remainder are corridors which involve little or no public lands. All corridors shown on the WUG maps that involve public lands, will be designated in the RMP (our current maps and records also indicate existing corridors which do not appear on the WUG maps).

#66

Black Hills Institute of Geological Research, INC
Box 643 / 217 Main St. / Hill City, SD 57745 / (605) 574-4289

December 28, 1983

David E. Howell
Hollister Resource Area Manager
Bureau of Land Management
P.O. Box 365
Hollister, CA. 95023

Dear Mr. Howell;

This letter is in reference to the "Proposed Resource Management Plan for the Hollister Planning Area etc." Because my interests lie in Paleontology I will restrict my comments to those Paleontological issues addressed in this proposal.

66-1 1. The review time and comment period on this proposed plan seems to be exceedingly short, and comes at a very busy time of year to solicite comments from the general public as well as the scientific community.

66-2 2. The section on Paleontological Resources (only three paragraphs long) is very short as well as very vague. Similar statements may be made concerning nearly any portion of the continental United States.

66-3 3. I find it inconceivable that conclusions reached by Mr. Crespin, who has a B.A. in Anthropology, could have any credibility in the areas of Vertebrate or Invertebrate Paleontology.

4. Why is it necessary to set aside 18,000 acres of PUBLIC LAND as "Areas of Critical Environmental Concern (ACEC)"? Paleontological exploration, collection and Paleontological specimens have little or no impact on the environment.

66-4 5. The present paleontological permit system under the National Natural Landmarks Program (NPS) is more than adequate to protect these Paleontological Resources.

6. There is no mention of mitigation as applicable to the scientific community, scientific suppliers, or amateur collectors.

66-5 7. The referenced paper on the Paleontology of the area (Arthur Staehler) seems to be lacking in Paleontological expertise and is strongly biased towards the closure of public land and the limiting of personal freedoms.

66-6 8. Fossils -in order to be saved from the ravages of nature- must be collected as they are exposed. Only limited knowledge may be gained in the field. They must be removed and prepared in order to be completely studied. This basic Paleontological concept is completely ignored.

66-6 Cont. 9. The millions of acres administered by the Bureau of Land Management are designated as "Multiple Use Land" and should remain thus. The problems posed to the Science of Paleontology by ACEC designation could be extreme.

In conclusion, I hope that you will reconsider the ACEC designation. I want to thank you for the opportunity to comment on this proposed plan. Enclosed is our check for the photocopies ($3.00).

Sincerely,

Peter L. Larson
President, Black Hills Institute of Geological Research, Inc.
President, American Association of Paleontological Suppliers

cc: Director B.L.M.
Assistant Secretary Energy and Minerals
Assistant Secretary Land and Water Resources

PLL/bl

Response to Letter No. 66

66-1 Comments were received during the 90-day review period which is in accordance with Bureau planning regulations.

66-2 Paleontological resources were considered a significant issue for planning purposes only in a portion of the Planning Area. Taken in the context of other multiple-use issues which the RMP must address, this section was necessarily brief but appropriate. The description given is site-specific to the areas in which these resources occur, including place names and geologic formations. Also see the response to 15-1.

66-3 Recommendations on the Paleontological resource were based on existing information and reports available to the Bureau of Land Management.

66-4 See the response to 49-2.

66-5 Dr. Staebler is recognized as perhaps the foremost authority on the paleontological resources of this area.

66-6 See the response to 49-2.

#67

THE RESOURCES AGENCY

Mr. Robert D. Rheiner, Jr.
Bureau of Land Management
800 Truxtun Avenue, Room 302
Bakersfield, CA 93301

December 22, 1983

Dear Mr. Rheiner:

The State has reviewed the draft Resource Management Plan and EIS, Hollister Planning Area, submitted through the Office of Planning and Research. Review was coordinated with the Water Resources Control Board, Coastal Commission, and Departments of Conservation, Fish and Game, Parks and Recreation, Water Resources, Food and Agriculture, and Transportation.

The Department of Fish and Game (DFG) recommends adoption of Alternative 1, because this would produce a significant decrease in wildlife/livestock competition. Alternative 2 would also reduce this competition, but to a lesser degree. Alternative 1A, which would eliminate grazing, was not selected because proper grazing can be beneficial to deer and most other wildlife species. Alternatives 3 and 4 were not selected because of their decreased benefits to wildlife.

In general, the major grazing leases appear to accommodate many wildlife needs, but additional measures should be considered for leases in Management Areas 6, 7, and 9. DFG's main concerns are that: (1) the 700 lbs/acre mulch retention standard may not provide enough protection in dry years for shrubs required by wildlife, (2) the season of use period for some leases may be excessive when considering wildlife forage and cover needs, and (3) additional water troughs and pipelines developed for livestock use have usually resulted in reduced cover for wildlife. DFG recommends that the following measures be incorporated into the Plan to address the above concerns:

67-1 1. The minimum mulch retention standard should be raised to 1,000 lbs/acre.

67-2 2. The season of grazing use should be limited to January 1 to April 30 or earlier.

67-3 3. Pipelines, troughs, and other livestock watering devices should not be developed until strict Allotment Management Plans have been prepared and there is a demonstrated ability to enforce them.

67-4 Problems also arise with season of livestock use on the smaller leases which are yearlong and rated custodial, such as on the South Bay Management Area 16. Grazing leases should not run into summer and fall when competition for available forage is most severe. Where this occurs, springs, riparian corridors, and fawning areas should be fenced to exclude livestock. Low fawn survival and consequential reduction of deer populations are believed to be related to heavy livestock grazing in these key areas.

67-5 Disposal of public lands should take into account the wildlife values of those lands, especially those going from public to private ownership. Public lands with high wildlife values should be retained or first offered to other public entities with wildlife interests. These lands should be retained even if they do not now have public access, because future access may become available through purchase of easements or by other modes of travel, such as small helicopters and ultralight aircraft.

67-6 DFG notes one error in the maps; the boundary between the San Benito and Santa Lucia deer herds should follow the Salinas River from the San Luis Obispo county line to Monterey Bay.

Questions regarding DFG comments should be directed to either Banky Curtis at (707) 944-4471, or Ed Smith at (209) 222-3761.

The Department of Parks and Recreation has these comments:

67-7 1. The Department's Division of Off-Highway Motor Vehicle Recreation is considering acquiring the Martin Ranch (Management Area 9) for use as a State Vehicular Recreation Area. Because of the interspersed BLM lands within the project, the Department would be interested in acquiring BLM lands in the area if it acquired the Martin Ranch. There are also remote isolated parcels within the Martin Ranch that may be unsuitable for OHV use or contain sensitive resources that make it more appropriate for BLM to manage them. The Department, therefore, would consider land exchange, cooperative agreement, and R&MP methods if it acquires the Martin Ranch.

67-8 2. Management Area 16 includes several parcels near and adjacent to the northwest boundary of Henry W. Coe State Park. Alternative 3 would make these parcels available to the State. The Department is interested in this, and will analyze the parcels' suitability for inclusion in the park in the General Plan that is now being prepared.

Sincerely,

GORDON F. SNOW, Ph.D
Assistant Secretary for Resources

(SCH 83100408)
cc: Office of Planning and Research

Response to Letter No. 67

67-1 See the response to Comment 51-3.

67-2 This season of use is outlined in the Panoche Hills Management Plan and is incorporated in the Preferred Alternative. It is meant to be a general guideline in that on some years it may be more or less restrictive, depending on growing conditions. The purpose is to prevent grazing, particularly by cattle, during the dry period when shrubs are more susceptible to browsing.

67-3 Livestock water facilities would only be developed in existing or proposed AMP areas.

67-4 Small, scattered leases will be managed custodially. The Bureau does not currently have the funding and manpower to intensively manage livestock grazing in these areas. Protection of key areas can be considered on a case-by-case basis.

67-5 We attempted to screen parcels that would meet these criteria before identifying them as suitable for disposal. Any parcel with significant value to wildlife such as RTE habitat would not be sold.

67-6 This error will be corrected in the final maps for the RMP.

67-7 Maximum public benefits would be realized through a land exchange or cooperative agreement, rather than direct disposal to the State under R&PP.

67-8 The Preferred Alternative has been modified to allow for management under cooperative agreement or make lands available to the State for inclusion in the park as necessary.

#68

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

David E. Howell
Hollister Resource Area Manager
Bureau of Land Management
P.O. Box 365
Hollister, California 95023

JAN 6 1984

Dear Mr. Howell:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled PROPOSED RESOURCE MANAGEMEMT PLAN FOR THE HOLLISTER PLANNING AREA. We have the enclosed comments regarding this DEIS.

We have classified this DEIS as Category LO-2 (lack of objections - more information needed). The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DEIS. Please send four copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Loretta Kahn Barsamian, Chief, EIS Review Section, at (415) 974-8188 or FTS 454-8188.

Sincerely yours,

Charles W. Murray

Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy, Technical, and
Resources Management

Enclosure (1)

General Comments

68-1 Activities included in the RMP, such as mining, energy development, recreation (ORVs), grazing and burning can have adverse impacts on both water quality and air quality. The FEIS should assess impacts to specific water resources, watersheds and air quality in the specific management areas where such activities are proposed.

In terms of water resources, these impacts could include degradation of surface or ground water quality from altered runoff patterns; sedimentation caused by erosion; and pollutants from grazing, facilities' operation, vehicles and mining leachate. The potential impacts to beneficial uses from the types of water quality impacts expected should be discussed for the specific management areas.

For air quality, these impacts could include fugitive dust emissions from mining, construction or vehicular activity; stationary source emissions from any processing or power facilities' operation; and carbon monoxide emissions. The FEIS should discuss any potential impacts to ambient air quality standards from the types of air quality impacts expected in the specific management areas.

68-2 The FEIS should also include a discussion of the specific BLM policies and regulations which will be used to protect soils, riparian vegetation, water quality and air quality from these impacts. A summary of the mitigation strategies which will be used in the management areas to mitigate impacts of development activities should be provided, and an assessment of their potential effectiveness provided.

Specific Water Quality Comments. For areas where the DEIS did address specific water quality issues we have the following comments:

68-3 1. The sedimentation of Hernandez Reservoir and the sedimentation study in Clear Creek are discussed on page 3-55. The FEIS should include a commitment that mitigation for the sedimentation problems will be implemented once the study is complete and that such mitigation will be appropriate in light of the study findings.

68-4 2. Watershed enhancement is listed as a goal in the DEIS. The specific enhancement projects for each watershed should be discussed in the FEIS. This discussion should include baseline water quality data for each water body in the watershed.

Clear Creek Management Area

68-5 Regarding the use of ORVs in the Clear Creek Recreational Area, we are concerned that the confirmed presence of asbestos in the area will precipitate an adverse impact to air quality and water quality. As stated in our letter of August 28, 1981, regarding the Environmental Assessment for the Clear Creek Recreational Area Off-Road Vehicle Designation, we continue to recommend a closed designation for ORV use due to the asbestos problem.

Pesticides Comments

68-6 The FEIS should state whether or not any pesticides (e.g., herbicides, insecticides, rodenticides, fungicides, etc.) will be used for vegetation clearance or control, maintenance operations, or the control of mosquito or other vector populations. If so, the types of pesticides, application rates, and application procedures should be addressed. Any pesticides used must be registered with the Environmental Protection Agency and the State and label directions and instructions followed. All applicable State regulations must also be followed. In addition, because the regulatory status of chemicals is constantly changing, EPA recommends that a periodic review of the chemical's current regulatory status be done prior to application. Should pesticides be used, EPA recommends that a specific section of the FEIS be devoted to the subject.

Response to Letter No. 68

68-1 The Draft RMP/EIS is issue oriented. Air quality and water quality were not considered significant issues for planning purposes throughout the Planning Area. The impacts from alternative management dealing with issues such as prescribed burning on air or water quality are discussed. The RMP will provide the guidance for developing site-specific activity plans and environmental assessments (EA) which will provide site-specific analysis of impacts. A good example of this is the San Benito County Prescribed Burn Plan and EA prepared in 1980 which gives an in-depth discussion of the effects of prescribed burning on air and water quality.

68-2 The RMP gives overall policy and guidance--these are contained on pages 2-2 through 2-5 of the Draft EIS and the Errata for Chapter 2. Site-specific activity plans will provide more detailed mitigation strategies for individual program activities.

68-3 The watershed "Best Management Practices" and proposed ACEC for the Clear Creek Area represent management commitment to mitigation of sedimentation problems in the area.

68-4 Specific enhancement projects will be considered in activity plan development. Prescribed burning and other measures are discussed as a means of general enhancement of watershed values in the alternatives contained in the Draft EIS.

68-5 See the response to Comments 1-1, 15-7 and 52-2.

68-6 The RMP/EIS does not contemplate the use of pesticides, etc. Any use of pesticides, etc. would be incidental and comply with EPA, Departmental and State regulations at the time of use.

Form 1279-3
(June 1984)

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